



**LOUISVILLE - JEFFERSON COUNTY METRO GOVERNMENT  
AIR POLLUTION CONTROL DISTRICT  
TITLE V OPERATING PERMIT**

Permit No: 108-99-TV

Plant ID: 1259

Effective Date:

Expiration Date:

UTM Northing: 4230.2

UTM Easting: 601.4

SIC: 2822

NAICS: 325212

AFS: 01259

Permission is hereby given by the Air Pollution Control District of Jefferson County to operate equipment located at:

**DuPont Dow Elastomers L.L.C. - Louisville Plant  
4242 Camp Ground Road  
Louisville, Kentucky 40216**

The applicable procedures of District Regulation 2.16 regarding review by the U.S. EPA and public participation have been followed in the issuance of this permit. Based on review of the application on file with the District, permission is given to operate under the conditions stipulated herein. This permit and the authorization to operate the emission units listed shall expire on midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the owner or operator may continue to operate in accordance with the terms and conditions of this permit beyond the expiration date, provided that a complete renewal application is submitted to the District no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Applicant for Permit: Dupont Dow Elastomers LLC

Responsible Official: David J. Pigion

Title of Responsible Official: Plant Manager

Date Application Received: 22 April 1997

Date Application Administratively Complete: 21 June 1997

Date Public Notice Given: 26 January 2003

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Reviewing Engineer (43)

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Air Pollution Control Officer

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**Title V Permit Revisions/Changes**

<b>Revision No.</b>	<b>Date of Reissuance</b>	<b>Public Notice Date</b>	<b>Type</b>	<b>Emission Unit/Page No.</b>	<b>Description</b>
Initial		01/26/2003	Initial	Entire Permit	Entire Permit

### Abbreviations and Acronyms

AC	- Additional Condition
AFS	- AIRS Facility Subsystem
AIRS	- Aerometric Information Retrieval System
APCD	- Air Pollution Control District
ASL	- Adjusted Significant Level
atm	- Atmosphere
BACT	- Best Available Control Technology
Btu	- British Thermal Unit
°C	- Degrees Centigrade
CAAA	- Clean Air Act Amendments (15 November 1990)
CEMS	- Continuous Emission Monitoring System
cf	- Cubic foot
DOE	- District Only Enforceable
°F	- Degrees Fahrenheit
gal	- Gallon
HAP	- Hazardous Air Pollutant
Hg	- Mercury
hr	- hour
l	- Liter
lbs	- Pounds
m	- Meter
MACT	- Maximum Achievable Control Technology
mg	- Milligram
mm	- Millimeter
MM	- Million
MOCS	- Management of Change System
NAICS	- North American Industry Classification System
NO <sub>x</sub>	- Nitrogen oxides
NSPS	- New Source Performance Standards
NSR	- New Source Review
PM	- Particulate Matter
PM <sub>10</sub>	- Particulate matter less than 10 microns
PMP	- Preventive Maintenance Plan
ppm	- Parts per million
PSD	- Prevention of Significant Deterioration
psia	- Pounds per square inch absolute
RACT	- Reasonably Available Control Technology
SIC	- Standard Industrial Classification
SIP	- State Implementation Plan
SO <sub>2</sub>	- Sulfur dioxide
TAL	- Threshold Ambient Limit
TAP	- Toxic Air Pollutant
tpy	- Tons per year
UTM	- Universal Transverse Mercator
VOC	- Volatile Organic Compound

## Preamble

Title V of the Clean Air Act Amendments of 1990 required EPA to create an operating permit program for implementation by state or local air permitting authorities. The purposes of this program are (1) to require an affected company to assume full responsibility for demonstrating compliance with applicable regulations; (2) to capture all of the regulatory information pertaining to an affected company in a single document; and (3) to make permits more consistent with each other.

A company is subject to the Title V program if it meets any of several criteria related to the nature or amount of its emissions. The Title V operating permit specifies what the affected company is, how it may operate, what its applicable regulations are, how it will demonstrate compliance, and what is required if compliance is not achieved. In Jefferson County, Kentucky, the Air Pollution Control District (APCDJC) is responsible for issuing Title V permits to affected companies and enforcing local regulations and delegated federal and state regulations. EPA may enforce federal regulations but not "District Only Enforceable Regulations".

Title V offers the public an opportunity to review and comment on a company's draft permit. It is intended to help the public understand the company's compliance responsibility under the Clean Air Act. Additionally, the Title V process provides a mechanism to incorporate new applicable requirements. Such requirements are available to the public for review and comment before they are adopted.

Title V Permit general conditions define requirements which are generally applicable to all Title V companies under the jurisdiction of APCDJC. This avoids repeating these requirements in every section of the company's Title V permit. Company-specific conditions augment the general conditions as necessary; these appear in the sections of the permit addressing individual emission units or emission points.

The general conditions include references to regulatory requirements that may not currently apply to the company, but which provide guidance for potential changes at the company or in the regulations during the life of the permit. Such requirements may become applicable if the company makes certain modifications or a new applicable requirement is adopted.

When the applicability of a section or subpart of a regulation is unclear, a clarifying citation will be made in the company's Title V permit at the emission unit/point level. Comments may also be added at the emission unit/point level to give further clarification or explanation.

The source's Title V permit may include a list of "insignificant activities," which are activities or processes falling into the general categories defined in Regulation 2.02, Section 2, and not associated with a specific operation or process for which there is a specific regulation. Activities so identified may be insignificant with regard to application disclosure requirements but may still have generally applicable requirements that continue to apply and must be included in the Title V operating permit. No periodic monitoring shall be required for facilities designated as insignificant activities.

### General Conditions

1. **Compliance** - The owner or operator shall comply with all applicable requirements and with all terms and conditions of this permit. Any noncompliance shall constitute a violation of the Act, State and District regulations and shall cause the source to be subject to enforcement actions including, but not limited to, the termination, revocation and reissuance, or revision of this permit, or denial of a permit application to renew this permit. Notwithstanding any other provision in the Jefferson County portion of the Kentucky SIP approved by EPA, any credible evidence may be used for the purpose of establishing whether the owner or operator is in compliance with, has violated, or is in violation of any such plan. (Regulation 2.16, sections 4.1.3, 4.1.13.1 and 4.1.13.7)
2. **Compliance Certification** - The owner or operator shall certify, annually or more frequently if required in applicable regulations, compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. This certification shall meet the requirements of Regulation 2.16, sections 3.5.11 and 4.3.5. The owner or operator shall submit the annual compliance certification directly to the following address as well as to the District, as set forth in Regulation 2.16, section 4.3.5.4:

*US EPA - Region IV  
Air Enforcement Branch  
Atlanta Federal Center  
61 Forsyth Street  
Atlanta, GA 30303-8960*

3. **Compliance Schedule** - A compliance schedule must meet the requirements of Regulation 2.16, section 3.5.9.5. The owner or operator shall submit a schedule of compliance for each emission unit that is not in compliance with all applicable requirements. A schedule of compliance shall be supplemental to, and shall not condone noncompliance with, the applicable requirements on which it is based. For each schedule of compliance, the owner or operator shall submit certified progress reports at least semi-annually, or at a more frequent period if specified in an applicable requirement or by the District in accordance with Regulation 2.16 section 4.3.4. The progress reports shall contain:
  - a. Dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when activities, milestones, or compliance were achieved.
  - b. An explanation of why dates in the schedule of compliance were not or will not be met, and preventive or corrective measures adopted.
4. **Duty to Supplement or Correct Application** - If the owner or operator fails to submit relevant facts or has submitted incorrect information in the permit application, it shall, upon discovery of the occurrence, promptly submit the supplementary facts or corrected information in accordance with Regulation 2.16, section 3.4.
5. **Emergency Provision**

- a. An emergency shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emission limitations. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:
  - i. An emergency occurred and that the owner or operator can identify the cause of the emergency.
  - ii. The permitted facility was at the time being properly operated.
  - iii. During the period of the emergency the owner or operator expeditiously took all reasonable steps, consistent with safe operating practices, to minimize levels of emissions that exceeded the emission standards or other requirements in this permit.
  - iv. The owner or operator submitted notice meeting the requirements of Regulation 1.07 of the time when emissions limitations were exceeded because of the emergency. This notice must fulfill the requirement of this condition, and must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.
- b. In an enforcement proceeding, the owner or operator seeking to establish the occurrence of an emergency has the burden of proof.
- c. This condition is in addition to any emergency or upset provision contained in an applicable requirement.

(Regulation 2.16, sections 4.7.1 through 4.7.4)

6. **Emission Fees Payment Requirements** - The owner or operator shall pay annual emission fees in accordance with Regulation 2.08. Failure to pay the emissions fees when due shall constitute a violation of District Regulations. Such failure is subject to penalties and an increase in the fee of an additional 5% per month up to a maximum of 25% of the original amount due. In addition, failure to pay emissions fees within 60 days of the due date shall automatically suspend this permit to operate until the fee is paid or a schedule for payment acceptable to the District has been established. (Regulation 2.08, section 1.3)
7. **Emission Offset Requirements** - The owner or operator shall comply with the requirements of Regulation 2.04.
8. **Enforceability Requirements** - Except for the conditions that are specifically designated as "District Only Enforceable Conditions", all terms and conditions of this permit, including any provisions designed to limit a source's potential to emit, are enforceable by EPA and citizens as specified under the Act. (Regulation 2.16, sections 4.2.1 and 4.2.2)
9. **Enforcement Action Defense**

- a. It shall not be a defense for the owner or operator in an enforcement action that it would have been necessary for the owner or operator to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- b. The owner or operator's failure to halt or reduce activity may be a mitigating factor in assessing penalties for noncompliance if the health, safety or environmental impacts of halting or reducing operations would be more serious than the impacts of continued operation.

(Regulation 2.16, sections 4.1.13.2 and 4.1.13.3)

10. **Hazardous Air Pollutants and Sources Categories** - The owner or operator shall comply with the applicable requirements of Regulations 5.02 and 5.14.
11. **Information Requests** - The owner or operator shall furnish to the District, within a reasonable time, information requested in writing by the District, to determine whether cause exists for revising, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The owner or operator shall also furnish, upon request, copies of records required to be kept by this permit. (Regulation 2.16, section 4.1.13.6) If information is submitted to the District under a claim of confidentiality, the source shall submit a copy of the confidential information directly to EPA. (Regulation 2.07, section 10.2)
12. **Insignificant Activities** - The owner or operator shall notify the District in a timely manner of any proposed change to an insignificant activity that would require a permit revision. (Regulation 2.16, section 5)
13. **Inspection and Entry** - Upon presentation of credentials and other documents as required by law, the owner or operator shall allow the District or an authorized representative to perform the following during reasonable hours:
  - a. Enter the premises to inspect any emissions-related activity or records required in this permit.
  - b. Have access to and copy records required by this permit.
  - c. Inspect facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required by this permit.
  - d. Sample or monitor substances or parameters to assure compliance with this permit or any applicable requirements.

(Regulation 2.16, section 4.3.2)

14. **Monitoring and Related Recordkeeping and Reporting Requirements** - The owner or operator shall comply with the requirements of Regulation 2.16, section 4.1.9. The owner or operator shall submit all required monitoring reports at least once every six months, unless more frequent reporting is required by an applicable requirement. The reporting period shall be January 1st through June 30th and July 1st through December 31st of each calendar year.

All reports shall be postmarked by the 60th day following the end of each reporting period. If surrogate operating parameters are monitored and recorded in lieu of emission monitoring, then an exceedance of multiple parameters may be deemed a single violation by the District for enforcement purposes.

15. **Off-permit Documents** - Any applicable requirements, including emission limitations, control technology requirements, or work practice standards, contained in an off-permit document cannot be changed without undergoing the permit revision procedures in Regulation 2.16, Section 5. (Regulation 2.16, section 4.1.5)
16. **Operational Flexibility** - The owner or operator may make changes without permit revision in accordance with Regulation 2.16, section 5.8.
17. **Permit Amendments (Administrative)** - This permit can be administratively amended by the District in accordance with Regulation 2.16, sections 2.3 and 5.4.
18. **Permit Application Submittal** - The owner or operator shall submit a timely and complete application for permit renewal or significant revision. If the owner or operator submits a timely and complete application then the owner or operator's failure to have a permit is not a violation until the District takes formal action on this permit application. This protection shall cease to apply if, subsequent to completeness determination, the owner or operator fails to submit, by the deadline specified in writing by the District, additional information required to process the application as required by Regulation 2.16, sections 3 and 5.2.
19. **Permit Duration** - This permit is issued for a fixed term of 5 years, in accordance with Regulation 2.16, section 4.1.8.3.
20. **Permit Renewal, Expiration and Application** - Permit renewal, expiration and application procedural requirements shall be in accordance with Regulation 2.16, sections 4.1.8.2 and 5.3. This permit may only be renewed in accordance with section 5.3.
21. **Permit Revisions** - No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in the permit. (Regulation 2.16, section 4.1.16)
22. **Permit Revision Procedures (Minor)** - Except as provided in 40 CFR Part 72, the Acid Rain Program, this permit may be revised in accordance with Regulation 2.16, section 5.5.
23. **Permit Revision Procedures (Significant)** - A source seeking to make a significant permit revision shall meet all the Title V requirements for permit applications, issuance and renewal, in accordance with Regulation 2.16, section 5.7, and all other applicable District Regulations.
24. **Permit Revocation and Termination by the District** - The District may terminate this permit only upon written request of the owner or operator. The District may revoke a permit for cause, in accordance with Regulation 2.16, section 5.11.1.1 through 5.11.1.5. For purposes of Section 5, substantial or unresolved noncompliance includes, but is not limited to:

- a. Knowingly operating process or air pollution control equipment in a manner not allowed by an applicable requirement or that results in excess emissions of a regulated air pollutant that would endanger the public or the environment.
  - b. Failure or neglect to furnish information, analyses, plans, or specifications required by the District.
  - c. Knowingly making any false statement in any permit application.
  - d. Noncompliance with Regulation 1.07, section 4.2; or
  - e. Noncompliance with KRS Chapter 77.
25. **Permit Shield** - The permit shield shall apply in accordance with Regulation 2.16, section 4.6.1.
  26. **Prevention of Significant Deterioration of Air Quality** - The owner or operator shall comply with the requirements of Regulation 2.05.
  27. **Property Rights** - This permit shall not convey property rights of any sort or grant exclusive privileges in accordance with Regulation 2.16, section 4.1.13.5.
  28. **Public Participation** - Except for modifications qualifying for administrative permit amendments or minor permit revision procedures, all permit proceedings shall meet the requirements of Regulations 2.07, Section 1; and 2.16, sections 5.1.1.2 and 5.5.4.
  29. **Reopening For Cause** - This permit shall be reopened and revised by the District in accordance with Regulation 2.16 section 5.9.
  30. **Reopening for Cause by EPA** - This permit may be revised, revoked and reissued or terminated for cause by EPA in accordance with Regulation 2.16 section 5.10.
  31. **Risk Management Plan (112(r))** - For each process subject to Section 112(r) of the Act, the owner or operator shall comply with 40 CFR Part 68 and Regulation 5.15.
  32. **Severability Clause** - The conditions of this permit are severable. Therefore, if any condition of this permit, or the application of any condition of this permit to any specific circumstance, is determined to be invalid, the application of the condition in question to other circumstances, as well as the remainder of this permit's conditions, shall not be affected. (Regulation 2.16, section 4.1.12)
  33. **Stack Height Considerations** - The owner or operator shall comply with the requirements of Regulation 2.10.
  34. **Startups, Shutdowns, and Malfunctions Requirements** - The owner or operator shall comply with the requirements of Regulation 1.07.

**35. Submittal of Reports, Data, Notifications, and Applications**

- a. Applications, reports, test data, monitoring data, compliance certifications, and any other document required by this permit as set forth in Regulation 2.16 sections 3.1, 3.4, 3.5, 4.1.13.6, 5.8.5 and 5.11.7 shall be submitted to:

*Louisville Metro Air Pollution Control District  
850 Barret Ave  
Louisville, KY 40204-1745*

- b. Documents which are specifically required to be submitted to EPA as set forth in Regulation 2.16 sections 3.3, and 5.8.5 shall be mailed to EPA at the following address:

*US EPA - Region IV  
APTMD - 12th floor  
Atlanta Federal Center  
61 Forsyth Street  
Atlanta, GA 30303-3104*

- 36. Other Applicable Regulations** - The owner or operator shall comply with all applicable requirements of the following regulations:

<b>FEDERALLY ENFORCEABLE REGULATIONS</b>	
<b>Regulation</b>	<b>Title</b>
1.01	General Application of Regulations and Standards
1.02	Definitions
1.03	Abbreviations and Acronyms
1.04	Performance Tests
1.05	Compliance with Emission Standards and Maintenance Requirements
1.06	Source Self-Monitoring and Reporting
1.07	Emissions During Startups, Shutdowns, Malfunctions, and Emergencies
1.08	Administrative Procedures
1.09	Prohibition of Air Pollution
1.10	Circumvention
1.11	Control of Open Burning
1.14	Control of Fugitive Particulate Emissions
2.01	General Application
2.02	Air Pollution Regulation Requirements and Exemptions
2.03	Permit Requirements - Non-Title V Construction and Operating Permits and Demolition/Renovation Permits

<b>FEDERALLY ENFORCEABLE REGULATIONS</b>	
<b>Regulation</b>	<b>Title</b>
2.07	Public Notification for Title V, PSD, and Offset Permits; SIP Revisions; and Use of Emission Reduction Credits
2.09	Causes for Permit Suspension
2.10	Stack Height Considerations
2.11	Air Quality Model Usage
2.16	Title V Operating Permits
4.01	General Provisions for Emergency Episodes
4.02	Episode Criteria
4.03	General Abatement Requirements
4.07	Episode Reporting Requirements
5.01	General Provisions (for Hazardous Air Pollutants)
5.03	Potential Hazardous Emissions
6.01	General Provisions (for <i>Existing Affected Facilities</i> )
6.02	Emission Monitoring for Existing Sources
7.01	General Provisions (for <i>New Affected Facilities</i> )

<b>DISTRICT ONLY ENFORCEABLE REGULATIONS</b>	
<b>Regulation</b>	<b>Title</b>
1.12	Control of Nuisances
1.13	Control of Objectionable Odors in the Ambient Air
2.08	Emissions Fees, Permit Fees, Permit Renewal Procedures, and Additional Program Fees
8.03	Commuter Vehicle Testing Requirements

37. **Stratospheric Ozone Protection Requirements** - Any facility having refrigeration equipment, including air conditioning equipment, which uses a Class I or II substance (listed in 40 CFR 82, Subpart A, Appendices A and B), and any facility which maintains, services, or repairs motor vehicles using a Class I or II substance as refrigerant must comply with all requirements of 40 CFR 82, Subparts A, B, and F. Those requirements include the following restrictions:

- a. Any facility having any refrigeration equipment normally containing fifty (50) pounds of refrigerant, or more, must keep servicing records documenting the date and type of all service and the quantity of any refrigerant added according to 40 CFR 82.166;
- b. No person repairing or servicing a motor vehicle may perform any service on a motor vehicle air conditioner (MVAC) involving the refrigerant for such air conditioner

unless the person has been properly trained and certified as provided in 40 CFR 82.34 and 40 CFR 82.40, and properly uses equipment approved according to 40 CFR 82.36 and 40 CFR 82.38, and complies with 40 CFR 82.42;

- c. No person may sell or distribute, or offer for sale or distribution, any substance listed as a Class I or II substance in 40 CFR 82, Subpart A, Appendices A and B, except in compliance with 40 CFR 82.34(b), 40 CFR 82.42, and/or 40 CFR 82.166.
- d. No person maintaining, servicing, repairing, or disposing of appliances may knowingly vent or otherwise release into the atmosphere any Class I or II substance used as a refrigerant in such equipment and no other person may open appliances (except MVACs as defined in 40 CFR 82.152) for service, maintenance, or repair unless the person has been properly trained and certified according to 40 CFR 82.161 and unless the person uses equipment certified for that type of appliance according to 40 CFR 82.158 and unless the person observes the practices set forth in 40 CFR 82.156 and 40 CFR 82.166;
- e. No person may dispose of appliances (except small appliances, as defined in 40 CFR 82.152) without using equipment certified for that type of appliance according to 40 CFR 82.158 and without observing the practices set forth in 40 CFR 82.156 and 40 CFR 82.166;
- f. No person may recover refrigerant from small appliances, MVACs and MVAC-like appliances (as defined in 40 CFR 82.152), except in compliance with the requirements of 40 CFR 82 Subpart F;
- g. If the permittee manufactures, transforms, imports, or exports, a Class I or II substance (listed in 40 CFR 82, Subpart A, Appendices A and B), the permittee is subject to all requirements as specified in 40CFR82 Subpart A, Production and Consumption Controls.

(Regulation 2.16, section 4.1.5)

**Emission Unit M1 Description:** Crude (Chloroprene) Monomer Storage**Applicable Regulations:**

<b>Federally Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Section(s)</b>
1.05	Compliance with Emission Standards and Maintenance Requirements	1, 2, 3, 4, & 5
6.13	Standard of Performance for Existing Storage Vessels for Volatile Organic Compounds	1, 2, & 5
6.24	Standard of Performance for Existing Sources Using Organic Materials	1, 2, 3.2, 3.3, 4, 5, & 7
40 CFR 63 Subpart A	General Provisions	63.1 through 63.15
40 CFR 63 Subpart U	National Emission Standards for Hazardous Air Pollutant Emissions: Group I Polymers and Resins	63.480 through 63.506

<b>District Only Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Section(s)</b>
5.02	Federal Emission Standards for Hazardous Air Pollutants Adopted by Reference	2.1, 2.18, 3, 4, & 5
5.11	Standards of Performance for Existing Sources Emitting Toxic Air Pollutants	1, 2, 3, 4, 5, & 6
5.14	Hazardous Air Pollutants and Source Categories	1, 2, & 3

**Allowable Emissions/Components:**

<b>Emission Point</b>	<b>Description***</b>	<b>Applicable Regulation(s)</b>	<b>Standards</b>	<b>Control Reference</b>	<b>Stack Reference</b>
100 A,B,C	(3) tankcar unloading stations (#2, 4, 6)	1.05; 5.11; 6.24	See Additional Condition 1.b.	None	S100 A,B,C
100 D,E,F	(3) Back-up tankcar unloading spots (#1, 3, 5)	1.05; 5.11; 6.24	See Additional Condition 1.b.	None	S100 D,E,F
101 A,B,C	(3) >40,000 gal BCD storage tanks installed 11/71 (#1, 2, 3)	1.05; 6.13; 40CFR63 Subpart U	See Additional Conditions 1.(a. & c.)	None (Submerged Fill)	S101 A,B,C

<b>Emission Point</b>	<b>Description***</b>	<b>Applicable Regulation(s)</b>	<b>Standards</b>	<b>Control Reference</b>	<b>Stack Reference</b>
101D	PTZ emergency inhibitor make-up tank (See Comment 1)	1.05; 6.24; 40CFR63 Subpart U	See Additional Conditions 1.(b. & c.)	None	S101D
101 E,F,G	(3) PTZ emergency inhibitor pots (#1, 2, 3)	1.05; 6.24; 40CFR63 Subpart U	See Additional Conditions 1.(b. & c.)	None	S101 E,F,G

Note: \*\*\*The description applies to plant nomenclature not regulatory nomenclature.  
See Appendix A for 40 CFR 63 Subpart U requirements

**Additional Conditions****1. Standards** (Regulation 2.16, section 4.1.1)**a. VOC** (Regulations 6.13; 6.24, section 3.2 and 3.3; and 40 CFR 63 Subpart U)

- i. There are no equipment standards that apply to emission points 101 (A, B, & C) due to the vapor pressure as stored being less than 1.5 psia. (Regulation 6.13, section 3)
- ii. The owner or operator shall not exceed the limitation on plant-wide VOC emissions of 4377 lbs/day, from all emission points which are subject to Regulation 6.24. This is based on the March 3, 1977 Board Order (Enforcement Order) and the November 27, 2000 compliance demonstration that indicates the total VOC(s) have been reduced by at least 85% by weight for all Class II and III solvents. (Regulation 6.24, sections 3.2 & 3.3) (See Comment 2)
- iii. The owner or operator shall not allow the headspace pressure of the railcar while unloading to exceed 20 psig. (See Comment 3)
- iv. The owner or operator shall comply with the standards as specified in 40 CFR 63 Subpart U. (See Appendix A for 40 CFR 63 Subpart U (MACT) Additional Conditions)

**b. TAP** (Regulations 5.11, section 1)

For all Toxic Air Pollutants (TAPs) that are not regulated by 40 CFR 63 Subpart U: The owner or operator shall not allow or cause the TAP emissions to exceed the adjusted significant level (ASL) value, unless modeling or a RACT/BACT analysis has been submitted and approved by the District. This additional condition applies to all TAPs emitted from emission points not subject to the MACT standard codified at 40 CFR Part 63, Subpart U, as well as to all non-organic TAP HAPs emitted from emission points subject to this MACT standard.

**2. Monitoring** (Regulation 2.16, section 4.1.9.1.2)**a. VOC**

- i. The temperature of the chloroprene in the storage tanks shall be monitored and recorded daily, when the tanks are in service, to assure the vapor pressure as stored remains below 1.5 psia to demonstrate compliance with Additional Condition 1.a. The temperature of the storage tanks shall be less than or equal to 1.7°C.
- ii. See Additional Condition 3.b.

- iii. The owner or operator shall monitor the headspace pressure at least once per railcar unloading. (See Comment 3)
- iii. The owner or operator shall comply with the monitoring requirements as specified in 40 CFR 63 Subpart U. (See Appendix A for 40 CFR 63 Subpart U (MACT) Additional Conditions)

b. **TAP**

See Additional Condition 3.b.

3. **Record Keeping** (Regulation 2.16, section 4.1.9.2)

a. **VOC** (Regulations 1.05, section 4 and 40 CFR 63 Subpart U)

- i. The temperature of the chloroprene in the storage tanks shall be recorded daily, when the tanks are in service, to assure the vapor pressure as stored remains below 1.5 psia to demonstrate compliance with Additional Condition 1.a.
- ii. When unloading occurs, the quantity of chloroprene unloaded shall be recorded daily. This value shall be used to demonstrate compliance with Additional Condition 1.b., with emissions calculated in a manner similar to the methodology presented in DuPont Dow's Regulation 6.24 compliance demonstration.
- iii. The owner or operator shall keep a record of each measured headspace pressure from the railcar unloading. (See Comment 3)
- iv. The owner or operator shall comply with the record keeping requirements as specified in 40 CFR 63 Subpart U. (See Appendix A for 40 CFR 63 Subpart U (MACT) Additional Conditions)

b. **TAP**

The owner or operator shall evaluate process changes to demonstrate that the emission levels established during compliance demonstrations are not exceeded. The owner or operator shall document these evaluations, and make these records available to the District upon request. If there is a net emission increase, the owner or operator shall demonstrate that this net emission increase will not exceed the adjusted significant level (ASL), based on potential to emit (PTE). This additional condition applies to all TAPs emitted from emission points not subject to the MACT standard codified at 40 CFR Part 63, Subpart U, as well as to all non-organic TAP HAPs emitted from emission points subject to the cited MACT standard.

4. **Reporting** (Regulation 2.16, section 4.1.9.3)

The owner or operator shall clearly identify all deviations from permit requirements in the semi-annual reports. If no deviations occur in that reporting period then the owner or operator shall report a negative declaration for the following category:

a. **VOC**

- i. For emission points 101(A,B,&C): There are no compliance reporting requirements for compliance with Regulation 6.13
- ii. For emission points subject to Regulation 6.24:
  - 1) Emission unit ID number and emission point ID number
  - 2) The beginning and ending date of the reporting period
  - 3) Total plant-wide VOC emissions averaged for each day in a calendar month
  - 4) Identification of all periods of exceedance of the VOC emission limit
  - 5) Description of any corrective action taken for each exceedance
- iii. For the railcar unloading headspace pressure:
  - 1) Emission unit ID number and emission point ID number
  - 2) The beginning and ending date of the reporting period
  - 3) Identification of all periods of exceedance of the pressure limit
  - 4) Description of any corrective action taken for each exceedance
- iv. For emission points subject to 40 CFR Part 63 Subpart U: The owner or operator shall comply with the reporting requirements as specified in 40 CFR Part 63 Subpart U.

b. **TAP**

There are no compliance reporting requirements for these pollutants.

**Comments**

1. DuPont Dow has provided a one-time PM compliance demonstration for emission point 101D. Since this demonstration is based on uncontrolled fugitive PM emissions, no monitoring, record keeping, and reporting are required for this emission point. Also, since this emission point is fugitive District Regulation 6.09 does not apply; this regulation only applies to stack PM emission points. This demonstration was submitted on November 27, 2000.
2. The District has agreed the 85% total VOC emission reduction required by Regulation 6.24 for subject emission points is an overall, plant-wide emission reduction.
3. This pressure limit will ensure that the one-time VOC compliance demonstration calculations, submitted on December 17, 2001 in response to EPA's e-mail requesting information dated July 31, 2001, remain valid. EPA initially requested this pressure limit during a conference call with the District on May 5, 2002.

4. As of June 19, 2001, TAPs that are also organic HAPs emitted from emission points subject to the MACT standard codified at 40 CFR Part 63, Subpart U are no longer subject to regulation as a TAP, but become subject instead to regulation under the applicable MACT standard as detailed in Additional Condition 1.a.iv.

**Emission Unit M2 Description:** CD (Chloroprene) Refining and Storage**Applicable Regulations:**

<b>Federally Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Section(s)</b>
1.05	Compliance with Emission Standards and Maintenance Requirements	1, 2, 3, 4, & 5
6.24	Standard of Performance for Existing Sources Using Organic Materials	1, 2, 3.2, 3.3, 4, 5, & 7
7.08	Standards of Performance for New Process Operations	1, 2, & 3
7.25	Standard of Performance for New Sources Using Volatile Organic Compounds	1, 2, 3, 4, 5
40 CFR 63 Subpart A	General Provisions	63.1 through 63.15
40 CFR 63 Subpart U	National Emission Standards for Hazardous Air Pollutant Emissions: Group I Polymers and Resins	63.480 through 63.506

<b>District Only Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Section(s)</b>
5.02	Federal Emission Standards for Hazardous Air Pollutants Adopted by Reference	2.1, 2.18, 3, 4, & 5
5.11	Standards of Performance for Existing Sources Emitting Toxic Air Pollutants	1, 2, 3, 4, 5, & 6
5.12	Standards of Performance for New or Modified Sources Emitting Toxic Air Pollutants	1, 2, 3, 4, & 5
5.14	Hazardous Air Pollutants and Source Categories	1, 2, & 3

**Allowable Emissions/Components:**

<b>Emission Point</b>	<b>Description ***</b>	<b>Applicable Regulation(s)</b>	<b>Standards</b>	<b>Control Reference</b>	<b>Stack Reference</b>
102A	CD Column Feed Tank	1.05; 6.24; 40CFR63 Subpart U	See Additional Conditions 1.a (i. & v.)	None	S102A

Emission Point	Description ***	Applicable Regulation(s)	Standards	Control Reference	Stack Reference
		5.11	See Additional Condition 1.b.		
102B, C	(2) Transfer Tanks (#1 & 2)	1.05; 6.24; 40CFR63 Subpart U	See Additional Conditions 1.a (i. & v.)	None	S102B
102E, F	(2) Refining Columns (#4,5)	1.05; 6.24; 40CFR63 Subpart U	See Additional Conditions 1.a (i. & v.)	None	S102 E, F
		5.11	See Additional Condition 1.b.		
102G (1 & 2)	(2) CD Heels Case (#1,2)	1.05; 6.24; 40CFR63 Subpart U	See Additional Conditions 1.a (i. & v.)	None	S102G
		5.11	See Additional Condition 1.b.		
102H	Heels Tank	1.05; 7.25; 40CFR63 Subpart U	See Additional Conditions 1.a. (ii. & v.)	None	S102H
		5.11	See Additional Condition 1.b.		
102I1	Corrosion Inhibitor Make-up Tank	7.08	See Additional Conditions 1.(c. & d.)	None	Fugitive
IA <sup>1</sup> -102I2	Corrosion Inhibitor Feed Tank	None (See Comment 1) (No known regulated pollutant)			
IA <sup>1</sup> -102J	Condensate Accumulator	None (See Comment 1) (No known regulated pollutant)			
102K	3 & 4 CD Steam Pot	1.05; 7.25; 40CFR63 Subpart U	See Additional Conditions 1.a. (iii. & v.)	None	Fugitive
		5.12	See Additional Condition 1.b.		

Notes: 1. Insignificant Activities, included because part of the process.

\*\*\*The description applies to plant nomenclature not regulatory nomenclature.

See Appendix A for 40 CFR 63 Subpart U requirements

**Additional Conditions**

1. **Standards** (Regulation 2.16, section 4.1.1)
  - a. **VOC** (Regulations 6.24, section 3.2 and 3.3; 7.25, section 3.1; and 40 CFR 63 Subpart U)
    - i. The owner or operator shall not exceed the limitation on plant-wide VOC emissions of 4377 lbs/day, from all emission points which are subject to Regulation 6.24. This is based on the March 3, 1977 Board Order (Enforcement Order) and the November 27, 2000 compliance demonstration that indicates the total VOC(s) have been reduced by at least 85% by weight for all Class II and III solvents. (Regulation 6.24, sections 3.2 & 3.3) (See Comment 3)
    - ii. The owner or operator shall not exceed 2.0 tons per year for emission point 102H. (Regulation 7.25, section 3.1) (See Comment 5)
    - iii. The owner or operator shall not exceed 0.04 tons per year for emission point 102K. (Regulation 7.25, section 3.1) (See Comment 5)
    - iv. The owner or operator shall not allow either of the refining columns (102E & F) to operate at an absolute pressure below a minimum of 200 mm Hg, while the refining column is processing chloroprene. (See Comment 6)
    - v. The owner or operator shall comply with the standards as specified in 40 CFR 63 Subpart U. (See Appendix A for 40 CFR 63 Subpart U (MACT) Additional Conditions)
  - b. **TAP** (Regulations 5.11, section 1 and 5.12, section 1)

For all Toxic Air Pollutants (TAPs) that are not regulated by 40 CFR 63 Subpart U: The owner or operator shall not allow or cause the TAP emissions to exceed the adjusted significant level (ASL) value, unless modeling or a RACT/BACT analysis has been submitted and approved by the District. This additional condition applies to all TAPs emitted from emission points not subject to the MACT standard codified at 40 CFR Part 63, Subpart U, as well as to all non-organic TAP HAPs emitted from emission points subject to this MACT standard.
  - c. **PM** (Regulation 7.08, section 3.1.2)

The owner or operator shall not cause, suffer, allow, or permit the emissions into the open air of particulate matter from any affected facility that is in excess of the quantity specified in Table 1 of Regulation 7.08 as the regulatory allowable.
  - d. **Opacity** (Regulation 7.08, section 3.1.1)

For emission points subject to Regulation 7.08: The owner or operator shall not cause to be discharged into the atmosphere from any affected facility, or from any air pollution control equipment installed on any affected facility, any gases that may contain particulate matter that is equal to or greater than 20% opacity.

2. **Monitoring** (Regulation 2.16, section 4.1.9.1.2)

a. **VOC**

- i. See Additional Condition 3.a.i.
- ii. The owner or operator shall monitor the operating pressure of each refining column (102E and 102F) at least once per day. (See Comment 6)
- iii. The owner or operator shall comply with the monitoring requirements as specified in 40 CFR 63 Subpart U. (See Appendix A for 40 CFR 63 Subpart U (MACT) Additional Conditions)

b. **TAP**

See Additional Condition 3.b.

c. **PM**

There are no compliance monitoring requirements for emission point 102I1. (See Comment 2)

d. **Opacity**

For emission point 102I1 subject to the opacity standard.

- i. When charging dry solids, the owner or operator shall conduct a weekly one-minute visible emissions survey, during normal operation and daylight hours, of the PM emission points. No more than four emission points shall be observed simultaneously.
- ii. For emission points without observed visible emissions during twelve consecutive operating weeks, the owner or operator may elect to conduct a monthly one-minute visible emission survey, during normal operation and daylight hours. No more than four emission points shall be observed simultaneously.
- iii. At emission points where visible emissions are observed, the owner or operator shall initiate corrective action within eight hours of the initial observation. If the visible emissions persist, the owner or operator shall perform or cause to be performed a Method 9 within 24 hours of the initial observation. If the opacity standard is exceeded, the owner or operator shall report the exceedance to the District, according to Regulation 1.07, and take

all practical steps to eliminate the exceedance. Subsequent visible emission surveys shall be conducted as indicated in item 2.d.i.

3. **Record Keeping** (Regulation 2.16, section 4.1.9.2)

a. **VOC** (Regulations 1.05, section 4, and 40 CFR 63 Subpart U)

- i. When any chloroprene refining column is producing refined chloroprene, the quantity of chloroprene processed shall be recorded daily. This value shall be used to demonstrate compliance with Additional Condition 1.a.i, with emissions calculated in a manner similar to the methodology presented in DuPont Dow's Regulation 6.24 compliance demonstration.
- ii. The owner or operator shall keep a daily record of the operating pressure of each refining column (102E and 102F).
- iii. The owner or operator shall comply with the record keeping requirements as specified in 40 CFR 63 Subpart U. (See Appendix A for 40 CFR 63 Subpart U (MACT) Additional Conditions)

b. **TAP**

The owner or operator shall evaluate process changes to demonstrate that the emission levels established during compliance demonstrations are not exceeded. The owner or operator shall document these evaluations, and make these records available to the District upon request. If there is a net emission increase, the owner or operator shall demonstrate that this net emission increase will not exceed the adjusted significant level (ASL), based on potential to emit (PTE). This additional condition applies to all TAPs emitted from emission points not subject to the MACT standard codified at 40 CFR Part 63, Subpart U, as well as to all non-organic TAP HAPs emitted from emission points subject to the cited MACT standard.

c. **PM**

There are no compliance record keeping requirements for emission point 102I1. (See Comment 2)

d. **Opacity**

The owner or operator shall maintain records of the results of all visible emission surveys and tests. Records of the results of any visible emissions survey shall include the date and the time of the survey, the name of the person conducting the survey, whether or not visible emissions were observed, and what if any corrective action was performed. If an emission point is not being operated during a given week (or month, as appropriate), then no visible emission survey needs to be performed and a negative declaration may be entered in the record.

4. **Reporting** (Regulation 2.16, section 4.1.9.3)

The owner or operator shall clearly identify all deviations from permit requirements in the semi-annual reports. If no deviations occur in that reporting period then the owner or operator shall report a negative declaration for the following category:

a. **VOC**

i. For emission points subject to Regulation 6.24:

- 1) Emission unit ID number and emission point ID number
- 2) The beginning and ending date of the reporting period
- 3) Total plant-wide VOC emissions averaged for each day in a calendar month
- 4) Identification of all periods of exceedance of the VOC emission limit
- 5) Description of any corrective action taken for each exceedance

ii. For the operating pressure of the refining columns:

- 1) Emission unit ID number and emission point ID number
- 2) The beginning and ending date of the reporting period
- 3) Identification of all periods of exceedance of the pressure limit
- 4) Description of any corrective action taken for each exceedance

iii. For emission points subject to 40 CFR Part 63 Subpart U: The owner or operator shall comply with the reporting requirements as specified in 40 CFR Part 63 Subpart U.

b. **TAP**

There are no compliance reporting requirements for these pollutants.

c. **PM**

There are no compliance reporting requirements for emission point 102I1. (See Comment 2)

d. **Opacity**

For emission point 102I1 subject to Regulation 7.08:

- i. Emission unit ID number and emission point or stack ID number
- ii. The beginning and ending date of the reporting period
- iii. The date, time and results of each Method 9 that exceeded the opacity standard
- iv. The number of surveys where visible emissions were observed
- v. Description of any corrective action taken

**Comments**

1. Insignificant Activities IA-(102I2 and 102J) are listed because they are part of the process but there are no known regulated emissions; therefore, there are no monitoring, record keeping, or reporting requirements for the purposes of Title V.
2. DuPont Dow has provided a one-time PM compliance demonstration for emission point 102I1. Since this demonstration is based on uncontrolled PM emissions, no monitoring, record keeping, and reporting are required for this emission point. This demonstration was submitted on November 27, 2000.
3. The District has agreed the 85% total VOC emission reduction required by Regulation 6.24 for subject emission points is an overall, plant-wide emission reduction.
4. Refining column #3 (Emission point 102D) and Ammonia storage vessel (Emission point IA-102L) were removed.
5. DuPont Dow has provided a one-time VOC compliance demonstration for emission points 102H and 102K. Therefore, there are no monitoring, recordkeeping, or reporting requirements. This demonstration was submitted on February 15, 2002.
6. This pressure limit will ensure that the one-time VOC compliance demonstration calculations, submitted on December 17, 2001 in response to EPA's e-mail requesting information dated July 31, 2001, remain valid. EPA initially requested this pressure limit during a conference call with the District on May 5, 2002.
7. As of June 19, 2001, TAPs that are also organic HAPs emitted from emission points subject to the MACT standard codified at 40 CFR Part 63, Subpart U are no longer subject to regulation as a TAP, but become subject instead to regulation under the applicable MACT standard as detailed in Additional Condition 1.a.v.

**Emission Unit M3 Description:** Monomer Storage**Applicable Regulations:**

<b>Federally Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Section(s)</b>
1.05	Compliance with Emission Standards and Maintenance Requirements	1, 2, 3, 4, & 5
6.13	Standard of Performance for Existing Storage Vessels for Volatile Organic Compounds	1, 2, & 5
6.24	Standard of Performance for Existing Sources Using Organic Materials	1, 2, 3.2, 3.3, 4, 5, & 7
7.12	Standard of Performance for New Storage Vessels for Volatile Organic Compounds	1, 2, 7, & 8
7.25	Standard of Performance for New Sources Using Volatile Organic Compounds	1, 2, 3, 4, 5
40 CFR 63 Subpart A	General Provisions	63.1 through 63.15
40 CFR 63 Subpart U	National Emission Standards for Hazardous Air Pollutant Emissions: Group I Polymers and Resins	63.480 through 63.506

<b>District Only Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Section(s)</b>
5.02	Federal Emission Standards for Hazardous Air Pollutants Adopted by Reference	2.1, 2.18, 3, 4, & 5
5.11	Standards of Performance for Existing Sources Emitting Toxic Air Pollutants	1, 2, 3, 4, 5, & 6
5.12	Standards of Performance for New or Modified Sources Emitting Toxic Air Pollutants	1, 2, 3, 4, & 5
5.14	Hazardous Air Pollutants and Source Categories	1, 2, & 3

**Allowable Emissions/Components:**

<b>Emission Point</b>	<b>Description* **</b>	<b>Applicable Regulation(s)</b>	<b>Standards</b>	<b>Control Reference</b>	<b>Stack Reference</b>
103A	Storage Tank #1	1.05; 6.13; 40CFR63 Subpart U	See Additional Conditions 1.a. (i. & iii.)	None (Submerged Fill)	S103A

<b>Emission Point</b>	<b>Description**</b>	<b>Applicable Regulation(s)</b>	<b>Standards</b>	<b>Control Reference</b>	<b>Stack Reference</b>
103B	Storage Tank #2	1.05; 7.12; 40CFR63 Subpart U	See Additional Conditions 1.a. (i. & v.)	None (Submerged Fill)	S103A
		5.12	See Additional Condition 1.b.		
103 (C & D)	(2) Storage Tanks (#4 & 5)	1.05; 7.12; 40CFR63 Subpart U	See Additional Conditions 1.a. (i. & v.)	None (Submerged Fill)	S103A
103E	Storage Tank #3	1.05; 7.12; 40CFR63 Subpart U	See Additional Conditions 1.a.(i. & v.)	None (Submerged Fill)	S103A or S103B
		5.12	See Additional Condition 1.b.		
103F	Storage Tank #10	1.05; 6.13; 40CFR63 Subpart U	See Additional Conditions 1.a.(i. & v.)	None (Submerged Fill)	S103B
		5.11	See Additional Condition 1.b.		
103G	Storage Tank #11 (Currently Out of Service)	1.05; 6.13; 40CFR63 Subpart U	See Additional Conditions 1.a.(i. & v.)	None (Submerged Fill)	S103B
		5.11	See Additional Condition 1.b.		
103H	CD Drumming operation	1.05; 7.25; 40CFR63 Subpart U	See Additional Conditions 1.a. (iii. & v.)	None	Fugitive
		5.12	See Additional Condition 1.b.		
103I	CD Selas Separator #1 (Currently Out of Service)	1.05; 6.24; 40CFR63 Subpart U	See Additional Conditions 1.a.(ii. & v.)	None	Fugitive
103 (J & K)	(2) CD Selas Separator (#2 & 3)	1.05; 6.24; 40CFR63 Subpart U	See Additional Conditions 1.a.(ii. & v.)	None	S103A
IA <sup>1</sup> -103L	Brine Treatment Tank #6 (Currently Out of Service)	None (See Comment 1) (No known regulated pollutants)			

<b>Emission Point</b>	<b>Description**</b>	<b>Applicable Regulation(s)</b>	<b>Standards</b>	<b>Control Reference</b>	<b>Stack Reference</b>
IA <sup>1</sup> -103M	Brine Storage Tank #7	None (See Comment 1) (No known regulated pollutants)			
103N	29E Steaming Pot	1.05; 7.25; 40CFR63 Subpart U	See Additional Conditions 1.a. (iv. & v.)	None	Fugitive
		5.12	See Additional Condition 1.b.		

Notes: 1. Insignificant Activities, included because part of the process.

\*\*\*The description applies to plant nomenclature not regulatory nomenclature.

See Appendix A for 40 CFR 63 Subpart U requirements

**Additional Conditions****1. Standards** (Regulation 2.16, section 4.1.1)**a. VOC** (Regulations 6.13; 6.24; 7.12; and 40 CFR 63 Subpart U)

- i. For emission points 103(A through G) subject to Regulation 6.13 or 7.12: If the storage vessel has a storage capacity greater than 250 gallons, and if the true vapor pressure of the volatile organic compound, as stored, is equal to or greater than 1.5 psia, as a minimum it shall be equipped with a permanent submerged fill pipe. True vapor pressure “as stored” shall be determined on an instantaneous basis under conditions representing expected worst case conditions. (Regulations 6.13 and 7.12, sections 3.3)
- ii. The owner or operator shall not exceed the limitation on plant-wide VOC emissions of 4377 lbs/day, from all emission points which are subject to Regulation 6.24. This is based on the March 3, 1977 Board Order (Enforcement Order) and the November 27, 2000 compliance demonstration that indicates the total VOC(s) have been reduced by at least 85% by weight for all Class II and III solvents. (Regulation 6.24, sections 3.2 & 3.3) (See Comment 2)
- iii. The owner or operator shall not exceed 0.003 tons per year for emission point 103H. (Regulation 7.25, section 3.1) (See Comment 5)
- iv. The owner or operator shall not exceed 0.062 tons per year for emission point 103N. (Regulation 7.25, section 3.1) (See Comment 5)
- v. The owner or operator shall comply with the standards as specified in 40 CFR 63 Subpart U. (See Appendix A for 40 CFR 63 Subpart U (MACT) Additional Conditions)

**b. TAP** (Regulations 5.11, section 1 & 5.12, section 1)

For all Toxic Air Pollutants (TAPs) that are not regulated by 40 CFR 63 Subpart U: The owner or operator shall not allow or cause the TAP emissions to exceed the adjusted significant level (ASL) value, unless modeling or a RACT/BACT analysis has been submitted and approved by the District. This additional condition applies to all TAPs emitted from emission points not subject to the MACT standard codified at 40 CFR Part 63, Subpart U, as well as to all non-organic TAP HAPs emitted from emission points subject to this MACT standard.

**2. Monitoring** (Regulation 2.16, section 4.1.9.1.2)**a. VOC**

- i. For emissions points 103 (A through G): There are no compliance monitoring requirements.

- ii. See Additional Condition 3.a.ii.
- iii. The owner or operator shall comply with the monitoring requirements as specified in 40 CFR 63 Subpart U. (See Appendix A for 40 CFR 63 Subpart U (MACT) Additional Conditions)

b. **TAP**

See Additional Condition 3.b.

3. **Record Keeping** (Regulation 2.16, section 4.1.9.2)

a. **VOC** (Regulation 1.05, section 4; and 40 CFR 63 Subpart U)

- i. For emission points 103 (A through G):

There are no record keeping requirements for compliance with Regulation 6.13 or 7.12.

- ii. For emission points subject to Regulation 6.24:

- 1) For emission point 103H: When drumming occurs, the quantity of material drummed shall be recorded daily. This value shall be used to demonstrate compliance with Additional Condition 1.a.ii., with emissions calculated in a manner similar to the methodology presented in DuPont Dow's Regulation 6.24 compliance demonstration.
- 2) For emission points 103(I, J, & K): The owner or operator shall keep a record to document any change in service or relocation of these devices. (See Comment 3)
- 3) For emission points 103 (I, J, & K): The emissions from the operation of these emission points shall be included in reports of overall VOC emissions for the emission unit to which they are attached.

- iii. The owner or operator shall comply with the record keeping requirements as specified in 40 CFR 63 Subpart U. (See Appendix A for 40 CFR 63 Subpart U (MACT) Additional Conditions)

b. **TAP**

The owner or operator shall evaluate process changes to demonstrate that the emission levels established during compliance demonstrations are not exceeded. The owner or operator shall document these evaluations, and make these records available to the District upon request. If there is a net emission increase, the owner or operator shall demonstrate that this net emission increase will not exceed the adjusted significant level (ASL), based on potential to emit (PTE). This additional condition applies to all TAPs emitted from emission points not subject to the MACT standard codified at 40

CFR Part 63, Subpart U, as well as to all non-organic TAP HAPs emitted from emission points subject to the cited MACT standard.

4. **Reporting** (Regulation 2.16, section 4.1.9.3)

The owner or operator shall clearly identify all deviations from permit requirements in the semi-annual reports. If no deviations occur in that reporting period then the owner or operator shall report a negative declaration for the following category:

a. **VOC**

- i. For emission points subject to Regulation 6.13 or 7.12: There are no compliance reporting requirements for these pollutants.
- ii. For emission points subject to Regulation 6.24:
  - 1) Emission unit ID number and emission point ID number
  - 2) The beginning and ending date of the reporting period
  - 3) Total plant-wide VOC emissions averaged for each day in a calendar month
  - 4) Identification of all periods of exceedance of the VOC emission limit
  - 5) Description of any corrective action taken for each exceedance
- iii. For emission points subject to 40 CFR Part 63 Subpart U: The owner or operator shall comply with the reporting requirements as specified in 40 CFR Part 63 Subpart U.

b. **TAP**

There are no compliance reporting requirements for these pollutants.

**Comments**

1. Insignificant Activities IA-(103L & 103M) are listed because they are part of the process but there are no known regulated emissions; therefore, there are no monitoring, record keeping, or reporting requirements for the purposes of Title V.
2. The District has agreed the 85% total VOC emission reduction required by Regulation 6.24 for subject emission points is an overall, plant-wide emission reduction.
3. Emission points 103(I, J, & K) can be moved around the plant to be utilized where they are needed and the emissions will be accounted for in the emission unit where they are being used.
4. As of June 19, 2001, the MACT standard supersedes the NSPS, and emission points (103B through 103E) are no longer subject to the requirements of 40 CFR Part 60, Subpart Kb, but become subject instead to the requirements of 40 CFR Part 63, Subpart U.

5. DuPont Dow has provided a one-time VOC compliance demonstration for emission points 103H and 103N. Therefore, there are no monitoring, recordkeeping, or reporting requirements. This demonstration was submitted on February 15, 2002.
  
6. As of June 19, 2001, TAPs that are also organic HAPs emitted from emission points subject to the MACT standard codified at 40 CFR Part 63, Subpart U are no longer subject to regulation as a TAP, but become subject instead to regulation under the applicable MACT standard as detailed in Additional Condition 1.a.v.

**Emission Unit M4 Description:** DC (Dichlorobutene) Manufacturing**Applicable Regulations:**

<b>Federally Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Section(s)</b>
1.05	Compliance with Emission Standards and Maintenance Requirements	1, 2, 3, 4, & 5
7.08	Standards of Performance for New Process Operations	1, 2, & 3
7.12	Standard of Performance for New Storage Vessels for Volatile Organic Compounds	1, 2, 7, & 8
7.25	Standard of Performance for New Sources Using Volatile Organic Compounds	1, 2, 3, 4, 5
40 CFR 63 Subpart A	General Provisions	63.1 through 63.15
40 CFR 63 Subpart U	National Emission Standards for Hazardous Air Pollutant Emissions: Group I Polymers and Resins	63.480 through 63.506

<b>District Only Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Section(s)</b>
5.02	Federal Emission Standards for Hazardous Air Pollutants Adopted by Reference	2.1, 2.18, 3, 4, & 5
5.12	Standards of Performance for New or Modified Sources Emitting Toxic Air Pollutants	1, 2, 3, 4, 5
5.14	Hazardous Air Pollutants and Source Categories	1, 2, & 3

**Allowable Emissions/Components:**

<b>Emission Point</b>	<b>Description**</b>	<b>Applicable Regulation(s)</b>	<b>Standards</b>	<b>Control Reference</b>	<b>Stack Reference</b>
104A	CD Tank	1.05; 7.12; 40CFR63 Subpart U	See Additional Conditions 1.a.(i. & iii.)	None (Submerged fill)	S104A
104B (1, 2, & 3)	(3) DC Reactors (#1, 2, & 3)	1.05; 7.25; 40CFR63 Subpart U	See Additional Conditions 1.a.(ii. & iii.)	Included with 104B4	S104B
		5.12	See Additional Condition 1.b.		
104B4	DC Vent Gas Separator #1	1.05; 7.25; 40CFR63 Subpart U	See Additional Conditions 1.a.(ii. & iii.)	None	S104B
		5.12	See Additional Condition 1.b.	C104 (2-stage Venturi scrubber)	
104B5	DC/Catalyst Decanter	1.05; 7.25; 40CFR63 Subpart U	See Additional Conditions 1.a.(ii. & iii.)	Included with 104B6	S104B
		5.12	See Additional Condition 1.b.		
104B6	DC Vent Gas Separator #2	1.05; 7.25; 40CFR63 Subpart U	See Additional Conditions 1.a.(ii. & iii.)	None	S104B
		5.12	See Additional Condition 1.b.	C104 (2-stage Venturi scrubber)	
104B7	DC Hold Tank	1.05; 7.25; 40CFR63 Subpart U	See Additional Conditions 1.a.(ii. & iii.)	Included with 104C or 104D	S104B
		5.12	See Additional Condition 1.b.		
104B8	DC Copper Pot	1.05; 7.25; 40CFR63 Subpart U	See Additional Conditions 1.a.(ii. & iii.)	Included with 104B1 or 104B2	S104B and Fugitive for PM emissions
		5.12	See Additional Condition 1.b.		

<b>Emission Point</b>	<b>Description**</b>	<b>Applicable Regulation(s)</b>	<b>Standards</b>	<b>Control Reference</b>	<b>Stack Reference</b>
		7.08	See Additional Conditions 1.(c. & d.)		
104 (C & D)	(2) DC Storage Tanks (#1 & 2)	1.05; 7.12; 40CFR63 Subpart U	See Additional Conditions 1.a.(i. & iii.)	None (Submerged fill)	S104B
		5.12	See Additional Condition 1.b.	C104 (2-stage Venturi scrubber)	

Notes: \*\*\*The description applies to plant nomenclature not regulatory nomenclature.  
 See Appendix A for 40 CFR 63 Subpart U requirements

**Additional Conditions**

1. **Standards** (Regulation 2.16, section 4.1.1)
  - a. **VOC** (Regulations 7.12; 7.25, section 3.1; and 40 CFR 63 Subpart U)
    - i. For emission points 104A, 104C, and 104D subject to Regulation 7.12: If the storage vessel has a storage capacity greater than 250 gallons, and if the true vapor pressure of the volatile organic compound, as stored, is equal to or greater than 1.5 psia, as a minimum it shall be equipped with a permanent submerged fill pipe. True vapor pressure “as stored” shall be determined on an instantaneous basis under conditions representing expected worst case conditions. (Regulation 7.12, section 3.3)
    - ii. The owner or operator shall not exceed the VOC limit of 18.4 tpy from the combined VOC emissions of emission points (104B1 through 104B8) from the BACT analysis dated February 15, 2002. (Regulation 7.25, sections 3.1) (See Comment 2)
    - iii. The owner or operator shall comply with the standards as specified in 40 CFR 63 Subpart U. (See Appendix A for 40 CFR 63 Subpart U (MACT) Additional Conditions)
  - b. **TAP** (Regulation 5.11, section 1)
    - i. For hydrochloric acid: The owner or operator shall not allow or cause hydrochloric acid emissions to exceed 2.8 lb/hr, on a one-hour-average basis, as demonstrated in modeling submitted to the District in April, 1993, and subsequently approved.
    - ii. For all Toxic Air Pollutants (TAPs) that are not regulated by 40 CFR 63 Subpart U: The owner or operator shall not allow or cause the TAP emissions to exceed the adjusted significant level (ASL) value, unless modeling or a RACT/BACT analysis has been submitted and approved by the District. This additional condition applies to all TAPs emitted from emission points not subject to the MACT standard codified at 40 CFR Part 63, Subpart U, as well as to all non-organic TAP HAPs emitted from emission points subject to this MACT standard.
  - c. **PM** (Regulation 7.08, section 3.1.2)

The owner or operator shall not cause, suffer, allow, or permit the emissions into the open air of particulate matter from any affected facility that is in excess of the quantity specified in Table 1 of Regulation 7.08 as the regulatory allowable.
  - d. **Opacity** (Regulation 7.08, section 3.1.1)

For emission point 104B8, the owner or operator shall not cause to be discharged into the atmosphere from any affected facility, or from any air pollution control equipment installed on any affected facility, any gases that may contain particulate matter that is equal to or greater than 20% opacity.

2. **Monitoring** (Regulation 2.16, section 4.1.9.1.2)

a. **VOC**

- i. For emissions points 104A, 104C, and 104D: There are no monitoring requirements for compliance with Regulation 7.12.
- ii. See Additional Condition 3.a.ii.
- iii. The owner or operator shall comply with the monitoring requirements as specified in 40 CFR 63 Subpart U. (See Appendix A for 40 CFR 63 Subpart U (MACT) Additional Conditions)

b. **TAP**

For emission points 104B(1 through 8), 104C, and 104D: When emission points 104B(1 through 8) are in operation, the owner or operator shall monitor, on a daily basis, the flow rate of water to each stage of the two-stage venturi scrubber (C104) for proper operation. DuPont Dow's standard operating condition is 3.7 gallons/min minimum per stage.

c. **PM**

There are no compliance monitoring requirements for emission point 104B8. (See Comment 1)

d. **Opacity**

For emission point 104B8 subject to the opacity standard.

- i. When charging dry solids, the owner or operator shall conduct a weekly one-minute visible emissions survey, during normal operation and daylight hours, of the PM emission points. No more than four emission points shall be observed simultaneously.
- ii. For emission points without observed visible emissions during twelve consecutive operating weeks, the owner or operator may elect to conduct a monthly one-minute visible emission survey, during normal operation and daylight hours. No more than four emission points shall be observed simultaneously.
- iii. At emission points where visible emissions are observed, the owner or operator shall initiate corrective action within eight hours of the initial

observation. If the visible emissions persist, the owner or operator shall perform or cause to be performed a Method 9 within 24 hours of the initial observation. If the opacity standard is exceeded, the owner or operator shall report the exceedance to the District, according to Regulation 1.07, and take all practical steps to eliminate the exceedance. Subsequent visible emission surveys shall be conducted as indicated in item 2.d.i.

3. **Record Keeping** (Regulation 2.16, section 4.1.9.2)

a. **VOC** (Regulation 1.05, section 4; 40 CFR 63 Subpart U)

i. For emission points 104A, 104C, and 104D:

There are no record keeping requirements for compliance with Regulation 7.12.

ii. When ACR (dichlorobutadiene) is produced, the quantity of ACR produced shall be recorded daily. This value shall be used to demonstrate compliance with Additional Condition 1.a.ii., with emissions calculated in a manner similar to the methodology presented in DuPont Dow's Regulation 6.24 compliance demonstration.

iii. The owner or operator shall comply with the record keeping requirements as specified in 40 CFR 63 Subpart U. (See Appendix A for 40 CFR 63 Subpart U (MACT) Additional Conditions)

b. **TAP**

i. For hydrochloric acid: The owner or operator shall keep records showing that any process changes have not impacted the modeling parameters (including but not limited to stack height, exhaust flow rate, maximum hourly emission rate, temperature, etc.).

ii. The owner or operator shall evaluate process changes to demonstrate that the emission levels established during compliance demonstrations are not exceeded. The owner or operator shall document these evaluations, and make these records available to the District upon request. If there is a net emission increase, the owner or operator shall demonstrate that this net emission increase will not exceed the adjusted significant level (ASL), based on potential to emit (PTE). This additional condition applies to all TAPs emitted from emission points not subject to the MACT standard codified at 40 CFR Part 63, Subpart U, as well as to all non-organic TAP HAPs emitted from emission points subject to the cited MACT standard.

iii. The owner or operator shall record, on a daily basis, the flow rate of water to each stage of the two-stage Venturi scrubber (C104).

c. **PM**

There are no compliance record keeping requirements for emission point 104B8. (See Comment 1)

d. **Opacity**

The owner or operator shall maintain records of the results of all visible emission surveys and tests. Records of the results of any visible emissions survey shall include the date and the time of the survey, the name of the person conducting the survey, whether or not visible emissions were observed, and what if any corrective action was performed. If an emission point is not being operated during a given week (or month, as appropriate), then no visible emission survey needs to be performed and a negative declaration may be entered in the record.

4. **Reporting** (Regulation 2.16, section 4.1.9.3)

The owner or operator shall clearly identify all deviations from permit requirements in the semi-annual reports. If no deviations occur in that reporting period then the owner or operator shall report a negative declaration for the following category:

a. **VOC**

- i. For emission points subject to Regulation 7.12, there are no compliance reporting requirements.
- ii. For emission points subject to Regulation 7.25, there are no compliance reporting requirements. (See Comment 2)
- iii. For emission points subject to 40 CFR Part 63 Subpart U: The owner or operator shall comply with the reporting requirements as specified in 40 CFR Part 63 Subpart U.

b. **TAP**

For control device C104:

- i. Emission unit ID number and control ID number
- ii. The beginning and ending date of the reporting period
- iii. Identification of what is being monitored
- iv. Number and type of repairs instituted during the reporting period
- v. Identification of all periods of exceedance of the monitored parameter(s)
- vi. Description of any corrective action taken for each exceedance

c. **PM**

There are no compliance reporting requirements for emission point 104B8. (See Comment 1)

d. **Opacity**

For emission point 104B8 subject to Regulation 7.08:

- i. Emission unit ID number and emission point or stack ID number
- ii. The beginning and ending date of the reporting period
- iii. The date, time and results of each Method 9 that exceeded the opacity standard
- iv. The number of surveys where visible emissions were observed
- v. Description of any corrective action taken

### **Comments**

1. DuPont Dow has provided a one-time PM compliance demonstration for emission point 104B8. Since this demonstration is based on uncontrolled PM emissions, no monitoring, record keeping, and reporting are required for this emission point. This demonstration was submitted on November 27, 2000.
2. DuPont Dow has provided a one-time VOC compliance demonstration for emission points 104B1 through 104B8. Therefore, there are no monitoring, recordkeeping or reporting requirements for these emission points to demonstrate compliance with the VOC emission limit. The one-time VOC compliance demonstration was submitted on February 15, 2002.
3. As of June 19, 2001, the MACT standard supersedes the NSPS, and emission points (104C and 104D) are no longer subject to the requirements of 40 CFR Part 60, Subpart Kb, but become subject instead to the requirements of 40 CFR Part 63, Subpart U.
4. As of June 19, 2001, TAPs that are also organic HAPs emitted from emission points subject to the MACT standard codified at 40 CFR Part 63, Subpart U are no longer subject to regulation as a TAP, but become subject instead to regulation under the applicable MACT standard as detailed in Additional Condition 1.b.ii.
5. The Venturi scrubber (C104) and its stack (S104B) will be relocated to the 3 & 4 CD building. This will move the point of emissions discharge farther away from the property line. Also the stack height will be increased to 66.6 feet. Since the dispersion modeling for Regulation 5.12 for HCl demonstrated compliance with the TAL, then by increasing the distance to the property line and raising the stack height will improve the margin of compliance with the TAL.

**Emission Unit M5 Description:** ACR (Dichlorobutadiene) Manufacturing**Applicable Regulations:**

<b>Federally Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Section(s)</b>
1.05	Compliance with Emission Standards and Maintenance Requirements	1, 2, 3, 4, & 5
5.15	Chemical Accident Prevention Provisions	1
6.13	Standard of Performance for Existing Storage Vessels for Volatile Organic Compounds	1, 2, & 5
6.24	Standard of Performance for Existing Sources Using Organic Materials	1, 2, 3.2, 3.3, 4, 5, & 7
7.12	Standard of Performance for New Storage Vessels for Volatile Organic Compounds	1, 2, 7
7.25	Standard of Performance for New Sources Using Volatile Organic Compounds	1, 2, 3, 4, 5
40 CFR 63 Subpart A	General Provisions	63.1 through 63.15
40 CFR 63 Subpart U	National Emission Standards for Hazardous Air Pollutant Emissions: Group I Polymers and Resins	63.480 through 63.506
40 CFR Part 68	Chemical Accident Prevention Provisions	Subpart A, B, & D through H

<b>District Only Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Section(s)</b>
5.02	Federal Emission Standards for Hazardous Air Pollutants Adopted by Reference	2.1, 2.18, 3, 4, & 5
5.11	Standards of Performance for Existing Sources Emitting Toxic Air Pollutants	1, 2, 3, 4, 5, & 6
5.12	Standards of Performance for New or Modified Sources Emitting Toxic Air Pollutants	1, 2, 3, 4, 5
5.14	Hazardous Air Pollutants and Source Categories	1, 2, & 3

**Allowable Emissions/Components:**

<b>Emission Point</b>	<b>Description ***</b>	<b>Applicable Regulation(s)</b>	<b>Standards</b>	<b>Control Reference</b>	<b>Stack Reference</b>
105A1	TCB Reactor (Chlorinator)	1.05; 7.25; 40CFR63 Subpart U	See Additional Conditions 1.a.(iii. & xii.)	None	Included with 105A2
		5.12	See Additional Condition 1.b.	C105A (Fume Scrubber); C105B (Chlorine Absorber (emergency)); C105C (Caustic Scrubber)	
105A2	HCl Separator	1.05; 7.25; 40CFR63 Subpart U	See Additional Conditions 1.a.(iii. & xii.)	None	S105A
		5.12	See Additional Condition 1.b.	C105A (Fume Scrubber); C105B (Chlorine Absorber (emergency)); C105C (Caustic Scrubber)	
105A3	HCl Stripper	1.05; 7.25; 40CFR63 Subpart U	See Additional Conditions 1.a.(iii. & xii.)	None	S105A
		5.12	See Additional Condition 1.b.	C105A (Fume Scrubber); C105B (Chlorine Absorber (emergency)); C105C (Caustic Scrubber)	
105A4	Chlorinator Hold-up Tank	1.05; 7.25; 40CFR63 Subpart U	See Additional Conditions 1.a.(iii. & xii.)	None	S105A
		5.12	See Additional Condition 1.b.	C105A (Fume Scrubber); C105B (Chlorine Absorber (emergency)); C105C (Caustic Scrubber)	
IA <sup>1</sup> -105C	HCl Wastewater Collection Tank	None (See Comment 1) (No known regulated pollutants)			

<b>Emission Point</b>	<b>Description ***</b>	<b>Applicable Regulation(s)</b>	<b>Standards</b>	<b>Control Reference</b>	<b>Stack Reference</b>
105A5	Crude TCB Tank	1.05; 7.12; 40CFR63 Subpart U	See Additional Conditions 1.a.(i. & xii.)	(Submerged fill)	S105A
		5.12	See Additional Condition 1.b.	C105A (Fume Scrubber); C105B (Chlorine Absorber (emergency)); C105C (Caustic Scrubber)	
105B1	TCB Column	1.05; 7.25; 40CFR63 Subpart U	See Additional Conditions 1.a.(iv. & xii.)	None	Included with IA-105B2
		5.12	See Additional Condition 1.b.		
IA <sup>1</sup> -105B2	TCB Entrainment Tank	None (See Comment 1) (No known regulated pollutants)			
105A6	TCB Tops Decanter	1.05; 6.13; 40CFR63 Subpart U	See Additional Conditions 1.a.(i. & xii.)	(Submerged fill)	S105A
		5.11	See Additional Condition 1.b.	C105A (Fume Scrubber); C105B (Chlorine Absorber (emergency)); C105C (Caustic Scrubber)	
105A7	TCB Tops Selas	1.05; 7.25; 40CFR63 Subpart U	See Additional Conditions 1.a.(v. & xii.)	Included with 105A6	Fugitive or Included with 105A6
		5.12	See Additional Condition 1.b.		
105A8	Refined TCB Storage Tank	1.05; 7.25; 40CFR63 Subpart U	See Additional Conditions 1.a.(vi. & xii.)	None	S105A
		5.12	See Additional Condition 1.b.	C105A (Fume Scrubber); C105B (Chlorine Absorber (emergency)); C105C (Caustic Scrubber)	

<b>Emission Point</b>	<b>Description ***</b>	<b>Applicable Regulation(s)</b>	<b>Standards</b>	<b>Control Reference</b>	<b>Stack Reference</b>
IA <sup>1</sup> -105D	Maintenance HCl Fume Scrubber	None (See Comment 1) (No known regulated pollutants)			
IA <sup>1</sup> -105E	Caustic Feed Tank	None (See Comment 1) (No known regulated pollutants)			
IA <sup>1</sup> -105F	Additive Feed Tank	None (See Comment 1) (No known regulated pollutants)			
105G (1 & 2)	(2) Dehydro Reactors (#1 & 2)	1.05; 7.25; 40CFR63 Subpart U	See Additional Conditions 1.a.(vii. & xii.)	None	Included with 105G(3 & 4) respectively
		5.11	See Additional Condition 1.b.		
105G (3 & 4)	(2) Dehydro Strippers (#1 & 2)	1.05; 7.25; 40CFR63 Subpart U	See Additional Conditions 1.a.(vii. & xii.)	None	Included with 105G(5 & 6) respectively
		5.11	See Additional Condition 1.b.		
105G5	Dehydro Cyclone (#1)	1.05; 7.25; 40CFR63 Subpart U	See Additional Conditions 1.a.(vii. & xii.)	None	Included with IA-105G7
		5.11	See Additional Condition 1.b.		
105G6	Dehydro Cyclone (#2)	1.05; 6.24; 40CFR63 Subpart U	See Additional Condition 1.a.(ii. & xii.)	None	Included with IA-105G7
		5.11	See Additional Condition 1.b.		
IA-105G7	Crude ACR/Water Separator	None (See Comment 1) (No known regulated pollutants)			
105B3	ACR Column	1.05; 7.25; 40CFR63 Subpart U	See Additional Conditions 1.a.(viii. & xii.)	None	Included with 105B4 or 105B5
		5.11	See Additional Condition 1.b.		
105B4	ACR Fume Scrubber #1	1.05; 6.24; 40CFR63 Subpart U	See Additional Conditions 1.a.(ii. & xii.)	None	Included with IA-105B6

<b>Emission Point</b>	<b>Description ***</b>	<b>Applicable Regulation(s)</b>	<b>Standards</b>	<b>Control Reference</b>	<b>Stack Reference</b>
		5.11	See Additional Condition 1.b.		
105B5	ACR Fume Scrubber #2	1.05; 6.24; 40CFR63 Subpart U	See Additional Conditions 1.a.(ii. & xii.)	None	Included with IA-105B7
		5.11	See Additional Condition 1.b.		
IA <sup>1</sup> -105B (6 & 7)	(2) ACR Fume Scrubber Drums (#1 & 2)	None (See Comment 1) (No known regulated pollutants) (55 gallon drums; with annual replacement in kind)			
105B8	Intercondenser #1	1.05; 6.24; 40CFR63 Subpart U	See Additional Conditions 1.a.(ii. & xii.)	None	Included with IA-105B10
		5.11	See Additional Condition 1.b.		
105B9	Intercondenser #2	1.05; 6.24; 40CFR63 Subpart U	See Additional Conditions 1.a.(ii. & xii.)	None	Included with IA-105B11
		5.11	See Additional Condition 1.b.		
IA <sup>1</sup> -105B (10 & 11)	(2) Intercondenser Drums (#1 & 2)	None (See Comment 1) (No known regulated pollutants) (55 gallon drums; with annual replacement in kind)			
105A9	ACR Heels Tank	1.05; 7.12; 40CFR63 Subpart U	See Additional Conditions 1.a.(i. & xii.)	(Submerged Fill)	S105A
		5.12	See Additional Condition 1.b.	C105A (Fume Scrubber); C105B (Chlorine Absorber (emergency)); C105C (Caustic Scrubber)	
105H	PTZ Make-up Tank (3 & 4 CD) (See Comment 2)	1.05; 6.24; 40CFR63 Subpart U	See Additional Conditions 1.a.(ii. & xii.)	None	S105H
		5.11	See Additional Condition 1.b.		

<b>Emission Point</b>	<b>Description ***</b>	<b>Applicable Regulation(s)</b>	<b>Standards</b>	<b>Control Reference</b>	<b>Stack Reference</b>
105I	PTZ Feed Tank (3 & 4 CD)	1.05; 7.25; 40CFR63 Subpart U	See Additional Conditions 1.a.(ix. & xii.)	None	S105I
		5.11	See Additional Condition 1.b.		
105J	DIBN Feed Pot for ACR	1.05; 7.25; 40CFR63 Subpart U	See Additional Conditions 1.a.(x. & xii.)	None	S105J
105 (K;L;M)	(3) DIBN Burette #3;4;5 CD Column	1.05; 6.24; 40CFR63 Subpart U	See Additional Conditions 1.a.(ii. & xii.)	None	S105 (K;L;M)
105N	DIBN Feed Pot for RCD	1.05; 7.25; 40CFR63 Subpart U	See Additional Conditions 1.a.(x. & xii.)	None	S105N
106 (A & C)	(2) ACR Lotting Tanks (#1 & 3)	1.05; 6.24; 40CFR63 Subpart U	See Additional Conditions 1.a.(ii. & xii.)	None	S106 (A & C)
106B	ACR Lotting Tank #2	1.05; 6.24; 40CFR63 Subpart U	See Additional Conditions 1.a.(ii. & xii.)	None	S106B
		5.11	See Additional Condition 1.b.		
106D (1 & 2)	(2) ACR Storage Tanks (#8 & 9)	1.05; 6.13; 40CFR63 Subpart U	See Additional Conditions 1.a.(i. & xii.)	None (Submerged fill)	S106D
106E	ACR Drumming	1.05; 7.25; 40CFR63 Subpart U	See Additional Conditions 1.a.(xi. & xii.)	None	S106E
		5.12	See Additional Condition 1.b.		

Notes: 1. Insignificant Activities, included because part of the process.

\*\*\*The description applies to plant nomenclature not regulatory nomenclature.

See Appendix A for 40 CFR 63 Subpart U requirements

**Additional Conditions**

1. **Standards** (Regulation 2.16, section 4.1.1)
  - a. **VOC** (Regulations 6.13; 7.12; 6.24, section 3.2 and 3.3; and 40 CFR 63 Subpart U)
    - i. For emission points 105A5, 105A6, 105A9, and 106D(1 & 2) subject to Regulation 6.13 or 7.12: If the storage vessel has a storage capacity greater than 250 gallons, and if the true vapor pressure of the volatile organic compound, as stored, is equal to or greater than 1.5 psia, as a minimum it shall be equipped with a permanent submerged fill pipe. True vapor pressure “as stored” shall be determined on an instantaneous basis under conditions representing expected worst case conditions. (Regulation 6.13, section 3.3; Regulation 7.12, section 3.3)
    - ii. The owner or operator shall not exceed the limitation on plant-wide VOC emissions of 4377 lbs/day, from all emission points which are subject to Regulation 6.24. This is based on the March 3, 1977 Board Order (Enforcement Order) and the November 27, 2000 compliance demonstration that indicates the total VOC(s) have been reduced by at least 85% by weight for all Class II and III solvents. (Regulation 6.24, sections 3.2 & 3.3) (See Comment 3)
    - iii. The owner or operator shall not exceed the VOC emission limit of 14.4 tpy combined from emission points (105A1 through 105A4) from the BACT analysis dated February 15, 2002. (Regulation 7.25, sections 3.1) (See Comment 4)
    - iv. The owner or operator shall not exceed the VOC emission limit of 2.6 tpy from emission points (105B1 and 105B2) from the BACT analysis dated February 15, 2002. (Regulation 7.25, sections 3.1) (See Comment 4)
    - v. The owner or operator shall not exceed the VOC emission limit of 0.08 tons per year for emission point (105A7). (Regulation 7.25, section 3.1) (See Comment 4)
    - vi. The owner or operator shall not exceed the VOC emission limit of 1.7 tpy from emission point (105A8) from the BACT analysis dated February 15, 2002. (Regulation 7.25, sections 3.1) (See Comment 4)
    - vii. The owner or operator shall not exceed the VOC emission limit of 0.001 tons per year combined for emission points (105G1 through 105G6) from the one-time compliance demonstration dated February 15, 2002. (Regulation 7.25, section 3.1) (See Comment 4)
    - viii. The owner or operator shall not exceed the VOC emission limit of 9.4 tons per year for emission point (105B3) from the BACT analysis and the one-time

compliance demonstration dated February 15, 2002. (Regulation 7.25, section 3.1) (See Comment 4)

- ix. The owner or operator shall not exceed the VOC emission limit of 0.04 tons per year for emission point (105I) from the one-time compliance demonstration dated February 15, 2002. (Regulation 7.25, section 3.1) (See Comment 4)
- x. The owner or operator shall not exceed the VOC emission limit of 0.34 tons per year for each emission point (105J-105N) from the one-time compliance demonstrations and the BACT analysis both dated February 15, 2002. (Regulation 7.25, section 3.1) (See Comment 4)
- xi. The owner or operator shall not exceed 0.06 tons per year for emission point (106E). (Regulation 7.25, section 3.1) (See Comment 4)
- xii. The owner or operator shall comply with the standards as specified in 40 CFR 63 Subpart U. (See Appendix A for 40 CFR 63 Subpart U (MACT) Additional Conditions)

b. **TAP** (Regulation 5.11, section 1)

- i. For hydrochloric acid: The owner or operator shall not allow or cause hydrochloric acid emissions to exceed 2.8 lb/hr, on a one-hour-average basis, as demonstrated in modeling submitted to the District in April, 1993, and subsequently approved.
- ii. For all Toxic Air Pollutants (TAPs) that are not regulated by 40 CFR 63 Subpart U: The owner or operator shall not allow or cause the TAP emissions to exceed the adjusted significant level (ASL) value, unless modeling or a RACT/BACT analysis has been submitted and approved by the District. This additional condition applies to all TAPs emitted from emission points not subject to the MACT standard codified at 40 CFR Part 63, Subpart U, as well as to all non-organic TAP HAPs emitted from emission points subject to this MACT standard.

c. **District Regulation 5.15 Regulated Substance** (40 CFR Part 68 Subpart G)

The owner or operator shall comply with the Risk Management Plan for the handling of chlorine, which has been submitted to the District and to the U.S. EPA. (See Off-Permits Documents Section of this Permit for Plan Date)

2. **Monitoring** (Regulation 2.16, section 4.1.9.1.2)

a. **VOC**

- i. For emissions points 105A5, 105A6, 105A9, and 106D(1 & 2): There are no monitoring requirements for compliance with Regulation 6.13 and 7.12.

- ii. For Regulations 6.24 and 7.25, see Additional Conditions 3.a.ii. and 3.a.iii, respectively.
- iii. The owner or operator shall comply with the monitoring requirements as specified in 40 CFR 63 Subpart U. (See Appendix A for 40 CFR 63 Subpart U (MACT) Additional Conditions)

b. **TAP**

For emission points 105A(1 through 9), when ACR manufacturing is in operation:

- i. The owner or operator shall monitor, on a daily basis, the flow rate of water to the fume scrubber (C105A) and to the caustic scrubber (C105C) for proper operation. DuPont Dow's standard operating conditions are 5 gallons per minute (gpm) minimum for the fume scrubber (C105A) and 20 gpm minimum for the caustic scrubber (C105C).
- ii. The owner or operator shall monitor, on a weekly basis, the concentration of the caustic solution in the chlorine absorber (C105B) for proper absorption capacity in the event of an emergency. DuPont Dow's standard operating condition is 12% NaOH by weight minimum for the caustic solution in the chlorine absorber (C105B).
- iii. See Additional Condition 3.b.

3. **Record Keeping** (Regulation 2.16, section 4.1.9.2)

a. **VOC** (Regulation 1.05, section 4, and 40 CFR 63 Subpart U)

- i. For emission points 105A5, 105A6, 105A9, and 106D (1 & 2): There are no record keeping requirements for compliance with Regulation 6.13.
- ii. For emission points subject to Regulation 6.24:

When ACR (dichlorobutadiene) is produced, the quantity of ACR produced shall be recorded daily. This value shall be used to demonstrate compliance with Additional Condition 1.a.ii, with emissions calculated in a manner similar to the methodology presented in DuPont Dow's Regulation 6.24 compliance demonstration.

- iii. For Emission Points subject to Regulation 7.25, there are no monitoring, recordkeeping, or reporting requirements. (See Comment 4)
- iv. The owner or operator shall comply with the record keeping requirements as specified in 40 CFR 63 Subpart U. (See Appendix A for 40 CFR 63 Subpart U (MACT) Additional Conditions)

b. **TAP**

- i. For hydrochloric acid: The owner or operator shall keep records showing that any process changes have not impacted the modeling parameters (including but not limited to stack height, exhaust flow rate, maximum hourly emission rate, temperature, etc.).
- ii. The owner or operator shall evaluate process changes to demonstrate that the emission levels established during compliance demonstrations are not exceeded. The owner or operator shall document these evaluations, and make these records available to the District upon request. If there is a net emission increase, the owner or operator shall demonstrate that this net emission increase will not exceed the adjusted significant level (ASL), based on potential to emit (PTE). This additional condition applies to all TAPs emitted from emission points not subject to the MACT standard codified at 40 CFR Part 63, Subpart U, as well as to all non-organic TAP HAPs emitted from emission points subject to the cited MACT standard.
- iii. The owner or operator shall record, on a daily basis, the flow rate of water to the fume scrubber (C105A) and to the caustic scrubber (C105C).
- iv. The owner or operator shall record, on a weekly basis, the concentration of the caustic solution in the chlorine absorber (C105B).

4. **Reporting** (Regulation 2.16, section 4.1.9.3)

The owner or operator shall clearly identify all deviations from permit requirements in the semi-annual reports. If no deviations occur in that reporting period then the owner or operator shall report a negative declaration for the following category:

a. **VOC**

- i. For emission points subject to Regulation 6.13 and 7.12, there are no compliance reporting requirements for this pollutants.
- ii. For emission points subject to Regulation 6.24:
  - 1) Emission unit ID number and emission point ID number
  - 2) The beginning and ending date of the reporting period
  - 3) Total plant-wide VOC emissions averaged for each day in a calendar month
  - 4) Identification of all periods of exceedance of the VOC emission limit
  - 5) Description of any corrective action taken for each exceedance
- iii. For emission points subject to Regulation 7.25, there are no compliance reporting requirements for this pollutant.
- iv. For emission points subject to 40 CFR Part 63 Subpart U: The owner or operator shall comply with the reporting requirements as specified in 40 CFR Part 63 Subpart U.

**b. TAP**

For control devices C105(A, B, & C):

- i. Emission unit ID number and control ID number
- ii. The beginning and ending date of the reporting period
- iii. Identification of what is being monitored
- iv. Number and type of repairs instituted during the reporting period
- v. Identification of all periods of exceedance of the monitored parameter(s)
- vi. Description of any corrective action taken for each exceedance

**Comments**

1. Insignificant Activities IA-[105C, 105B2, 105(D, E, & F), 105G7, 105B(6 & 7), and 105B(10 & 11)] are listed because they are part of the process but there are no known regulated emissions; therefore, there are no monitoring, record keeping, or reporting requirements for the purposes of Title V.
2. DuPont Dow has provided a one-time PM compliance demonstration for emission point 105H. Since this demonstration is based on uncontrolled fugitive PM emissions, no monitoring, record keeping, and reporting are required for this emission point. Also, since this emission point is fugitive District Regulation 6.09 does not apply, this regulation only applies to stack PM emission points. This demonstration was submitted on November 27, 2000.
3. The District has agreed the 85% total VOC emission reduction required by Regulation 6.24 for subject emission points is an overall, plant-wide emission reduction.
4. DuPont Dow has provided a one-time VOC compliance demonstration for emission points 105A1 through 105A4, 105B1, 105B2, 105A7, 105A8, 105G1 through 105G5, 105B3, 105I, 105J, 105N, and 106E. Therefore, there are no monitoring, recordkeeping or reporting requirements for these emission points to demonstrate compliance with the VOC limit. The one-time VOC compliance demonstration was submitted on February 15, 2002.
5. As of June 19, 2001, TAPs that are also organic HAPs emitted from emission points subject to the MACT standard codified at 40 CFR Part 63, Subpart U are no longer subject to regulation as a TAP, but become subject instead to regulation under the applicable MACT standard as detailed in Additional Condition 1.a.xiii.

**Emission Unit M6 Description:** Auxiliary Chemical Storage**Applicable Regulations:**

<b>Federally Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Section(s)</b>
1.05	Compliance with Emission Standards and Maintenance Requirements	1, 2, 3, 4, & 5
6.13	Standard of Performance for Existing Storage Vessels for Volatile Organic Compounds	1, 2, 3.3, & 5
7.12	Standard of Performance for New Storage Vessels for Volatile Organic Compounds	1, 2, 3.3, 7, & 8
40 CFR 63 Subpart A	General Provisions	63.1 through 63.15
40 CFR 63 Subpart U	National Emission Standards for Hazardous Air Pollutant Emissions: Group I Polymers and Resins	63.480 through 63.506

<b>District Only Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Section(s)</b>
5.02	Federal Emission Standards for Hazardous Air Pollutants Adopted by Reference	2.1, 2.18, 3, 4, & 5
5.11	Standards of Performance for Existing Sources Emitting Toxic Air Pollutants	1, 2, 3, 4, 5, & 6
5.12	Standards of Performance for New or Modified Sources Emitting Toxic Air Pollutants	1, 2, 3, 4, & 5
5.14	Hazardous Air Pollutants and Source Categories	1, 2, & 3

**Allowable Emissions/Components:**

<b>Emission Point</b>	<b>Description**</b>	<b>Applicable Regulation(s)</b>	<b>Standards</b>	<b>Control Reference</b>	<b>Stack Reference</b>
107	Toluene Storage Tank	1.05; 7.12; 40CFR63 Subpart U	See Additional Conditions 1.a.(i. & ii.)	None (Submerged Fill)	S107
		5.12	See Additional Condition 1.b.		
108 (A & B)	(2) Acetic Acid Storage Tanks (#1 & 2)	1.05; 6.13	See Additional Conditions 1.a. (i. & ii.)	None (Submerged Fill)	S108 (A & B)
		5.11	See Additional Condition 1.b.		
109 (A & B)	(2) 20% HCl Storage Tanks (#1 & 2)	5.12	See Additional Condition 1.b.	None	S109 (A & B)
110A	Liquid Waste Organic Storage Tank #1	1.05; 7.12; 40CFR63 Subpart U	See Additional Conditions 1.a.(i. & ii.)	None (Submerged Fill)	S110
		5.12	See Additional Condition 1.b.		
110B	Liquid Waste Organic Storage Tank #3	1.05; 7.12; 40CFR63 Subpart U	See Additional Conditions 1.a.(i. & ii.)	None (Submerged Fill)	S110
		5.12	See Additional Condition 1.b.		
IA <sup>1</sup> -111	Waste Tanker Loading	None (See Comments 1 & 2) (Not a volatile organic material. True vapor pressure of residual organics in material as stored is always less than 1.5 psia). (No applicable regulation) [Emissions accounted for at Waste Organic Storage Tanks emission points 110 (A & B)]			
112 (A & B)	(2) DIBN Storage Tanks (#1 & 2)	1.05; 7.12; 40CFR63 Subpart U	See Additional Conditions 1.a.(i. & ii.)	None (Submerged Fill)	S112 (A & B)
IA <sup>1</sup> -113 (A & B)	(2) Caustic Storage Tanks (#1 & 2)	None (See Comment 1) (No known regulated pollutant emitted from aqueous solution)			
IA <sup>1</sup> -114 (A & B)	(2) Liquid Nitrogen Storage Tanks (#1 & 2)	None (See Comment 1) (No known regulated pollutant) (Pressurized Vessels)			

Emission Point	Description* **	Applicable Regulation(s)	Standards	Control Reference	Stack Reference
IA <sup>1</sup> -114C	Liquid Nitrogen Storage Tank for Chlorine Unloading	None (See Comment 1) (No known regulated pollutant) (Pressurized Vessel)			

Notes: 1. Insignificant Activities, included because part of the process.

\*\*\*The description applies to plant nomenclature not regulatory nomenclature.

See Appendix A for 40 CFR 63 Subpart U requirements

**Additional Conditions****1. Standards** (Regulation 2.16, section 4.1.1)**a. VOC** (Regulations 6.13 and 7.12, section 3.3; and 40 CFR 63 Subpart U)

- i. For emission points 107, 108 (A & B), 110 (A & B), and 112 (A & B) subject to Regulations 6.13 or 7.12: If the storage vessel has a storage capacity greater than 250 gallons, and if the true vapor pressure of the volatile organic compound, as stored, is equal to or greater than 1.5 psia, as a minimum it shall be equipped with a permanent submerged fill pipe. True vapor pressure “as stored” shall be determined on an instantaneous basis under conditions representing expected worst case conditions. (Regulations 6.13 and 7.13, section 3.3)
- ii. The owner or operator shall comply with the standards as specified in 40 CFR 63 Subpart U. (See Appendix A for 40 CFR 63 Subpart U (MACT) Additional Conditions)

**b. TAP** (Regulations 5.11 and 5.12, section 1)

For all Toxic Air Pollutants (TAPs) that are not regulated by 40 CFR 63 Subpart U: The owner or operator shall not allow or cause the TAP emissions to exceed the adjusted significant level (ASL) value, unless modeling or a RACT/BACT analysis has been submitted and approved by the District. This additional condition applies to all TAPs emitted from emission points not subject to the MACT standard codified at 40 CFR Part 63, Subpart U, as well as to all non-organic TAP HAPs emitted from emission points subject to this MACT standard.

**2. Monitoring** (Regulation 2.16, section 4.1.9.1.2)**a. VOC**

- i. For emission points 107, 108 (A & B), 110 (A & B), and 112 (A & B) there are no compliance monitoring requirements.
- ii. The owner or operator shall comply with the monitoring requirements as specified in 40 CFR 63 Subpart U. (See Appendix A for 40 CFR 63 Subpart U (MACT) Additional Conditions)

**b. TAP**

See Additional Condition 3.b.

**3. Record Keeping** (Regulation 2.16, section 4.1.9.2)**a. VOC** (Regulation 1.05, section 4; and 40 CFR 63 Subpart U)

- i. For emission points 107, 108 (A & B), 110 (A & B), and 112 (A & B) subject to Regulations 6.13 or 7.12: There are no record keeping requirements for these emission points.
- ii. The owner or operator shall comply with the record keeping requirements as specified in 40 CFR 63 Subpart U. (See Appendix A for 40 CFR 63 Subpart U (MACT) Additional Conditions)

**b. TAP**

The owner or operator shall evaluate process changes to demonstrate that the emission levels established during compliance demonstrations are not exceeded. The owner or operator shall document these evaluations, and make these records available to the District upon request. If there is a net emission increase, the owner or operator shall demonstrate that this net emission increase will not exceed the adjusted significant level (ASL), based on potential to emit (PTE). This additional condition applies to all TAPs emitted from emission points not subject to the MACT standard codified at 40 CFR Part 63, Subpart U, as well as to all non-organic TAP HAPs emitted from emission points subject to the cited MACT standard.

**4. Reporting** (Regulation 2.16, section 4.1.9.3)

The owner or operator shall clearly identify all deviations from permit requirements in the semi-annual reports. If no deviations occur in that reporting period then the owner or operator shall report a negative declaration for the following category:

**a. VOC**

- i. For emission points 107, 108(A & B), 110(A & B), and 112(A & B) subject to Regulation 6.13 or 7.12: There are no compliance reporting requirements.
- ii. For emission points subject to 40 CFR Part 63 Subpart U: The owner or operator shall comply with the reporting requirements as specified in 40 CFR Part 63 Subpart U.

**b. TAP**

There are no compliance reporting requirements for these pollutants.

**Comments**

1. Insignificant Activities IA-[111, 113(A & B), and 114(A, B, & C)] are listed because they are part of the process but there are no known regulated emissions; therefore, there are no monitoring, record keeping, or reporting requirements for the purposes of Title V.
2. DuPont Dow has provided a one-time volatile organic material (VOM) nonapplicability compliance demonstration for insignificant activity IA-111. Per this demonstration the vapor pressure as stored cannot exceed 1.5 psia; therefore, the material is not defined as a VOM per

Regulation 7.22, and no monitoring, record keeping, and reporting are required. This activity is exempt from this Regulation 7.22 and is insignificant. This demonstration was submitted on November 27, 2000.

3. HCl modeling does not apply to this emission unit. The emission points (109A and 109B) were returned to service after the modeling was performed and a separate determination was made that the maximum hourly emissions of HCl would not exceed the ASL.
4. As of June 19, 2001, the MACT standard supersedes the NSPS, and emission points (107 and 110B) are no longer subject to the requirements of 40 CFR Part 60, Subpart Kb, but become subject instead to the requirements of 40 CFR Part 63, Subpart U.
5. As of June 19, 2001, TAPs that are also organic HAPs emitted from emission points subject to the MACT standard codified at 40 CFR Part 63, Subpart U are no longer subject to regulation as a TAP, but become subject instead to regulation under the applicable MACT standard as detailed in Additional Condition 1.a.ii.

**Emission Unit P-1 Description:** LPK (Large Polymerization Kettles) Solution Make-Up**Applicable Regulations:**

<b>Federally Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Section(s)</b>
1.05	Compliance with Emission Standards and Maintenance Requirements	1, 2, 3, 4, & 5
6.09	Standards of Performance for Existing Process Operations	1, 2, & 3
6.24	Standard of Performance for Existing Sources Using Organic Materials	1, 2, 3.2, 3.3, 4, 5, & 7
7.08	Standards of Performance for New Process Operations	1, 2, & 3
7.12	Standard of Performance for New Storage Vessels for Volatile Organic Compounds	1, 2, 3.3, 7, & 8
40 CFR 63 Subpart A	General Provisions	63.1 through 63.15
40 CFR 63 Subpart U	National Emission Standards for Hazardous Air Pollutant Emissions: Group I Polymers and Resins	63.480 through 63.506

<b>District Only Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Section(s)</b>
5.02	Federal Emission Standards for Hazardous Air Pollutants Adopted by Reference	2.1, 2.18, 3, 4, & 5
5.11	Standards of Performance for Existing Sources Emitting Toxic Air Pollutants	1, 2, 3, 4, 5, & 6
5.12	Standards of Performance for New or Modified Sources Emitting Toxic Air Pollutants	1, 2, 3, 4, & 5
5.14	Hazardous Air Pollutants and Source Categories	1, 2, & 3

**Allowable Emissions/Components:**

<b>Emission Point</b>	<b>Description ***</b>	<b>Applicable Regulation(s)</b>	<b>Standards</b>	<b>Control Reference</b>	<b>Stack Reference</b>
200 (A, B, C, & D)	(4) Large Weigh Tanks (#1, 2, 3, & 4) (See Comment 2)	1.05; 6.24; 40CFR63 Subpart U	See Additional Conditions 1.a.(i. & ii.)	None	S200 (A, B, C, & D)

Emission Point	Description ***	Applicable Regulation(s)	Standards	Control Reference	Stack Reference
		5.11	See Additional Condition 1.b.		
200E (1 & 2)	(2) Weigh Tank Backflush (#1 & 2)	1.05; 6.24; 40CFR63 Subpart U	See Additional Conditions 1.a.(i. & ii.)	None	S200E (1 & 2)
		5.11	See Additional Condition 1.b.		
200F	LWT Emergency Inhibitor Tank (At RCD Storage)	1.05; 6.24; 40CFR63 Subpart U	See Additional Conditions 1.a.(i. & ii.)	None	S200F
200G (1, 2, 3, & 4)	(4) Sulfur Tanks (#1, 2, 3, & 4)	6.09	See Additional Conditions 1.(c. & d.)	None	S200G
IA <sup>1</sup> -200G5	Weigh Tank Additives in Drums and Totes	None (See Comment 1) (No applicable regulation)			
201 (A,B,C,D, E,& F)	(6) Stabilizer Make-up Tanks (#3, 4, 7, 8, 1, & 2)	1.05; 6.24; 40CFR63 Subpart U	See Additional Conditions 1.a.(i. & ii.)	None	S201[A(1&2),B(1&2), C(1&2),D(1&2),E(1&2), & F(1&2)]
		5.11	See Additional Condition 1.b.		
		6.09	See Additional Conditions 1.(c.& d.)		
201 (G & H)	(2) Stabilizer Make-up Tanks (#5 & 6) (Currently out of service) (See Comment 2)	1.05; 6.24; 40CFR63 Subpart U	See Additional Conditions 1.a.(i. & ii.)	None	Fugitive or S201(G & H)
		5.11	See Additional Condition 1.b.		
IA <sup>1</sup> -201I	Stabilizer Inhibitor Weigh Tank	None (See Comment 1) (No known regulated pollutants) (Nonvolatile aqueous solution)			
IA <sup>1</sup> -201J	NaOH Weigh Tank in Stabilizer Area	None (See Comment 1) (No known regulated pollutants emitted from aqueous solution)			

Emission Point	Description ***	Applicable Regulation(s)	Standards	Control Reference	Stack Reference
IA <sup>1</sup> -201K	Inhibitor Tote in Stabilizer Make-up Area	None (See Comment 1) (No known regulated pollutants)			
202A	Stripper Inhibitor Make-up Tank	1.05; 6.24; 40CFR63 Subpart U	See Additional Conditions 1.a.(i. & ii.)	None	S202A (1 & 2)
		5.11	See Additional Condition 1.b.		
		6.09	See Additional Conditions 1.(c. & d.)		
202B	Stripper Inhibitor Feed Tank	1.05; 6.24; 40CFR63 Subpart U	See Additional Conditions 1.a.(i. & ii.)	None	S202B
		5.11	See Additional Condition 1.b.		
202C1	Co-monomer Scale Tank	1.05; 6.24; 40CFR63 Subpart U	See Additional Conditions 1.a.(i. & ii.)	None	S202C
IA <sup>1</sup> -202C2	Co-monomer and other Raw Material Drums and Totes	None (See Comment 1) (No known regulated pollutants)			
202D1	East Poly Make-up Scale	6.09	See Additional Conditions 1.(c. & d.)	C202D <sup>2</sup> (Filter)	S202D
202D2	Large Creaming Make-up Tank	7.08	See Additional Conditions 1.(c. & d.)	C202D <sup>2</sup> (Filter)	S202D
202D3	Coagulant Salt Solution Make-up Tank	7.08	See Additional Conditions 1.(c. & d.)	C202D <sup>2</sup> (Filter)	S202D
		5.12	See Additional Condition 1.b.		
202E	Modifier Storage Tank	1.05; 7.12; 40CFR63 Subpart U	See Additional Conditions 1.a.(ii. & iii.)	IA <sup>1</sup> -C202E [Carbon Canister] (See Comment 9)	S202E
202F1	Rosin Storage Tank	1.05; 7.12; 40CFR63 Subpart U	See Additional Conditions 1.a.(ii. & iii.)	None	S202F1

<b>Emission Point</b>	<b>Description ***</b>	<b>Applicable Regulation(s)</b>	<b>Standards</b>	<b>Control Reference</b>	<b>Stack Reference</b>
IA <sup>1</sup> -202F2	Resin Railcar	None (See Comment 1) (No known regulated pollutants)			
IA <sup>1</sup> -202G (1 & 2)	(2) Rosin Scale Tanks (#1 & 2)	None (See Comment 1) (No known regulated pollutants)			
IA <sup>1</sup> -202G3	Resin Scale Tank	None (See Comment 1) (No known regulated pollutants)			
IA <sup>1</sup> -202H	G-Type Additive Storage Tank	None (See Comment 1) (No known regulated pollutants)			
IA <sup>1</sup> -202I	Brine Storage (Near East Poly)	None (See Comment 1) (No known regulated pollutants)			
IA <sup>1</sup> -202J	Dispersant Make-up Tank	None (See Comment 1) (No known regulated pollutants)			
IA <sup>1</sup> -202K	Post-add Ingredient Tote	None (See Comment 1) (No applicable regulation)			
IA <sup>1</sup> -202L	Small Creaming Make-up Tank	None (See Comments 1 & 6) (No known regulated pollutants)			
IA <sup>1</sup> -202M	Post-add Ingredient Make-up Tank	None (See Comment 1) (No known regulated pollutants)			
IA <sup>1</sup> -202N(1-3)	(3) Catalyst Make-up Tanks (#1, 2, & 4)	None (See Comments 1 & 6) (No applicable regulation)			
IA <sup>1</sup> -202O	Soap Solution Tank	None (See Comment 1) (No known regulated pollutants emitted from aqueous solution)			
IA <sup>1</sup> -202P (1, 3, & 4)	(3) Old Water Solution Tanks (#3, 5, & 6) (Currently out of service)	None (See Comments 1 & 6) (No applicable regulation)			
IA <sup>1</sup> -202P2	Water Solution Tank #4	None (See Comment 1) (No known regulated pollutants emitted from Diluted aqueous solution)			
IA <sup>1</sup> -202P5	NaOH Hold Tank (Currently out of service)	None (See Comment 1) (No known regulated pollutants emitted from aqueous solution)			

Emission Point	Description ***	Applicable Regulation(s)	Standards	Control Reference	Stack Reference
IA <sup>1</sup> -202P (6 & 7)	(2) NaOH Scale Tanks (#1 & 2) (Currently out of service)	None (See Comment 1) (No known regulated pollutants emitted from aqueous solution)			
IA <sup>1</sup> -202P8	West Water Solution Tanks Pit	None (See Comment 1) (No known regulated pollutants)			
IA <sup>1</sup> -202Q (1, 2, 3, & 4)	(4) Water Solution Tank #3 (formerly designated #1); #5 (formerly designated #2); #7 & 8	None (See Comments 1 & 6) (No applicable regulation)			
IA <sup>1</sup> -202Q (5, 6 & 7)	(3) NaOH Scale Tanks (#1, 2, & 3)	None (See Comment 1) (No known regulated pollutants emitted from aqueous solution)			
IA <sup>1</sup> -202Q8	East Water Solution Tanks Pit	None (See Comment 1) (No known regulated pollutants)			
IA <sup>1</sup> -202R (1, 2, & 3)	(3) Post-add Tanks (#1, 2, & 3)	None (See Comment 1) (No known regulated pollutants)			
202S (#1,2,3,4,9 & 10)	(6) Catalyst Tanks (#1,2,3,4,9 & 10)	1.05; 6.24; 40CFR63 Subpart U	See Additional Conditions 1.a.(i. & ii.)	None	S202S
		5.11	See Additional Condition 1.b.		
		6.09	See Additional Conditions 1.(c. & d.)		
202S (5,6,7, & 8)	(4) Catalyst Tanks (#5, 6, 7, & 8) (See Comment 6)	1.05; 6.24; 40CFR63 Subpart U	See Additional Conditions 1.a.(i. & ii.)	None	Fugitive
		5.11	See Additional Condition 1.b.		
IA <sup>1</sup> -202T	Caustic Tank (5th floor)	None (See Comment 1) (No known regulated pollutants emitted from aqueous solution)			
IA <sup>1</sup> -202U1	Brine Inhibitor Tote (Dilute NaOH)	None (See Comment 1) (No known regulated pollutants emitted from aqueous solution) (Dilute aqueous caustic solution added to brine to control pH)			

Emission Point	Description ***	Applicable Regulation(s)	Standards	Control Reference	Stack Reference
IA <sup>1</sup> -202U2	Corrosion Inhibitor Pump Tank	None (See Comment 1) (No known regulated pollutants)			
IA <sup>1</sup> -202V	Brine Storage Tank (North of East Poly)	None (See Comment 1) (No known regulated pollutants)			
IA <sup>1</sup> -202 W1	Dilute Alkali Storage Tank	None (See Comment 1) (No known regulated pollutants emitted from aqueous solution)			
IA <sup>1</sup> -202 W2	Alkali Storage Tank	None (See Comment 1) (No known regulated pollutants emitted from aqueous solution)			
IA <sup>1</sup> -202X (1 & 2)	(2) Demin. Water Tanks (#1 & 2) (5th floor)	None (See Comment 1) (No known regulated pollutants)			

Notes: 1. Insignificant Activities, included because part of the process.  
 2. The control device is only required when weighing PM materials or charging dry solids  
 \*\*\*The description applies to plant nomenclature not regulatory nomenclature.  
 See Appendix A for 40 CFR 63 Subpart U requirements

**Additional Conditions**1. **Standards** (Regulation 2.16, section 4.1.1)a. **VOC** (Regulations 6.24, section 3.2 and 3.3; 7.12, section 3.3; and 40 CFR 63 Subpart U)

i. The owner or operator shall not exceed the limitation on plant-wide VOC emissions of 4377 lbs/day, from all emission points which are subject to Regulation 6.24. This is based on the March 3, 1977 Board Order (Enforcement Order) and the November 27, 2000 compliance demonstration that indicates the total VOC(s) have been reduced by at least 85% by weight for all Class II and III solvents. (Regulation 6.24, sections 3.2 & 3.3) (See Comment 7)

ii. The owner or operator shall comply with the standards as specified in 40 CFR 63 Subpart U. (See Appendix A for 40 CFR 63 Subpart U (MACT) Additional Conditions)

iii. There is no equipment standard that applies to emission points 202E and 202F1 due to the vapor pressure of the material as stored being less than 1.5 psia. (Regulation 7.12, section 3) (See Comment 5)

b. **TAP** (Regulations 5.11 and 5.12, section 1)

For all Toxic Air Pollutants (TAPs) that are not regulated by 40 CFR 63 Subpart U: The owner or operator shall not allow or cause the TAP emissions to exceed the adjusted significant level (ASL) value, unless modeling or a RACT/BACT analysis has been submitted and approved by the District. This additional condition applies to all TAPs emitted from emission points not subject to the MACT standard codified at 40 CFR Part 63, Subpart U, as well as to all non-organic TAP HAPs emitted from emission points subject to this MACT standard.

c. **PM** (Regulations 6.09, section 3.2; and 7.08, section 3.1.2)

The owner or operator shall not cause, suffer, allow, or permit the emissions into the open air of particulate matter from any affected facility that is in excess of the quantity specified in Table 1 of Regulation 6.09 or Table 1 of Regulation 7.08 as the regulatory allowable.

d. **Opacity** (Regulations 6.09, section 3.1; and 7.08, section 3.1.1)

For emission points subject to Regulation 6.09 or 7.08: The owner or operator shall not cause to be discharged into the atmosphere from any affected facility, or from any air pollution control equipment installed on any affected facility, any gases that may contain particulate matter that is equal to or greater than 20% opacity.

2. **Monitoring** (Regulation 2.16, section 4.1.9.1.2)

a. **VOC**

- i. See Additional Condition 3.a.i.
- ii. The owner or operator shall comply with the monitoring requirements as specified in 40 CFR 63 Subpart U. (See Appendix A for 40 CFR 63 Subpart U (MACT) Additional Conditions)
- iii. For the emission points 202E and 202F1 subject to Regulation 7.12, there are no compliance monitoring requirements.
- iv. For the insignificant activity (IA-C202E): There are no monitoring requirements as this insignificant activity is used voluntarily for odor control. (See Comment 10)

b. **TAP**

See Additional Condition 3.b.

c. **PM**

- i. For emission points 202D(1, 2, & 3): The owner or operator shall visually inspect, on a monthly basis, the filter system C202D for any deterioration in the device. Any noted material failures shall have repairs instituted within 7 days after the discovery. If repairs cannot be completed within the specified time frame then a request for an extension shall be made. (See Comment 4)
- ii. There are no compliance monitoring requirements for emission points 200G(1-4), 201(A-F), 202A, and 202S(1-4,9,&10). (See Comment 3)

d. **Opacity**

For emission points subject to the opacity standard.

- i. When charging dry solids, the owner or operator shall conduct a weekly one-minute visible emissions survey, during normal operation and daylight hours, of the PM emission points. No more than four emission points shall be observed simultaneously.
- ii. For emission points without observed visible emissions during twelve consecutive operating weeks, the owner or operator may elect to conduct a monthly one-minute visible emission survey, during normal operation and daylight hours. No more than four emission points shall be observed simultaneously.
- iii. At emission points where visible emissions are observed, the owner or operator shall initiate corrective action within eight hours of the initial observation. If the visible emissions persist, the owner or operator shall

perform or cause to be performed a Method 9 within 24 hours of the initial observation. If the opacity standard is exceeded, the owner or operator shall report the exceedance to the District, according to Regulation 1.07, and take all practical steps to eliminate the exceedance. Subsequent visible emission surveys shall be conducted as indicated in item 2.d.i.

3. **Record Keeping** (Regulation 2.16, section 4.1.9.2)

a. **VOC** (Regulation 1.05, section 4, and 40 CFR 63 Subpart U)

- i. When any charges are processed, the number of charges processed shall be recorded daily. This value shall be used to demonstrate compliance with Additional Condition 1.a.i, with emissions calculated in a manner similar to the methodology presented in DuPont Dow's Regulation 6.24 compliance demonstration.
- ii. The owner or operator shall comply with the record keeping requirements as specified in 40 CFR 63 Subpart U. (See Appendix A for 40 CFR 63 Subpart U (MACT) Additional Conditions)
- iii. For emission points subject to Regulation 7.12, there are no compliance recordkeeping requirements. (See Comment 5)
- iv. For insignificant activity carbon canister IA-C202E, there are no compliance recordkeeping requirements, as this insignificant activity is used voluntarily for odor control. (See Comment 10)

b. **TAP**

The owner or operator shall evaluate process changes to demonstrate that the emission levels established during compliance demonstrations are not exceeded. The owner or operator shall document these evaluations, and make these records available to the District upon request. If there is a net emission increase, the owner or operator shall demonstrate that this net emission increase will not exceed the adjusted significant level (ASL), based on potential to emit (PTE). This additional condition applies to all TAPs emitted from emission points not subject to the MACT standard codified at 40 CFR Part 63, Subpart U, as well as to all non-organic TAP HAPs emitted from emission points subject to the cited MACT standard.

c. **PM**

- i. For emission points 202D(1, 2, & 3): The owner or operator shall record any noted material failures of the control device (C202D) that require repairs to be instituted within 7 days after the discovery. If repairs cannot be completed within the specified time frame then a request for an extension shall be made. (See Comment 4)

- ii. There are no compliance record keeping requirements for emission points 200G(1 through 4), 201(A through F), 202A, and 202S(1 through 4, 9, &10) subject to Regulation 6.09. (See Comment 3)

d. **Opacity**

The owner or operator shall maintain records of the results of all visible emission surveys and tests. Records of the results of any visible emissions survey shall include the date and the time of the survey, the name of the person conducting the survey, whether or not visible emissions were observed, and what if any corrective action was performed. If an emission point is not being operated during a given week (or month, as appropriate), then no visible emission survey needs to be performed and a negative declaration may be entered in the record.

4. **Reporting** (Regulation 2.16, section 4.1.9.3)

The owner or operator shall clearly identify all deviations from permit requirements in the semi-annual reports. If no deviations occur in that reporting period then the owner or operator shall report a negative declaration for the following category:

a. **VOC**

- i. For emission points subject to Regulation 6.24:

- 1) Emission unit ID number and emission point ID number
- 2) The beginning and ending date of the reporting period
- 3) Total plant-wide VOC emissions averaged for each day in a calendar month
- 4) Identification of all periods of exceedance of the VOC emission limit
- 5) Description of any corrective action taken for each exceedance

- ii. For emission points subject to 40 CFR 63 Subpart U: The owner or operator shall comply with the reporting requirements as specified in the regulation.

- iii. For emission points subject to Regulation 7.12, there are no compliance reporting requirements for these pollutants.

- iv. For insignificant activity IA-C202E, there are no compliance reporting requirements. (See Comment 10)

b. **TAP**

There are no compliance reporting requirements for these pollutants.

c. **PM**

There are no compliance reporting requirements for emission points 200G(1 through 4), 201(A through F), 202A, and 202S(1 through 4, 9, & 10) subject to Regulation 6.09. (See Comment 3)

**d. Opacity**

For emission points subject to Regulation 6.09:

- i. Emission unit ID number and emission point or stack ID number
- ii. The beginning and ending date of the reporting period
- iii. The date, time and results of each Method 9 that exceeded the opacity standard
- iv. The number of surveys where visible emissions were observed
- v. Description of any corrective action taken

**e. For control device C202D (See Comment 4):**

- i. Emission unit ID number and control ID number
- ii. The beginning and ending date of the reporting period
- iii. Identification of what is being monitored
- iv. Number and type of repairs instituted during the reporting period
- v. Description of any corrective action taken for each exceedance.

### **Comments**

1. Insignificant Activities IA-[200G5, 201I, 201J, 201K, 202C2, 202F2, 202G(1,2,&3), 202H, 202I, 202J, 202K, 202L, 202M, 202N(1-3), 202O, 202P(1-8), 202Q(1-8), 202R(1,2,&3), 202T, 202U(1&2), 202V, 202W(1&2), and 202X(1&2)] are listed because they are part of the process but there are no known regulated emissions; therefore, there are no monitoring, record keeping, or reporting requirements for the purposes of Title V.
2. DuPont Dow has provided one-time PM compliance demonstrations for emission points 200(A-D), and 201(G & H). Since these demonstrations are based on uncontrolled fugitive PM emissions, no monitoring, record keeping, and reporting are required for these emission points. Also, since these emission points are fugitive District Regulation 6.09 does not apply, this regulation only applies to stack PM emission points. These demonstrations were submitted on November 27, 2000.
3. DuPont Dow has provided one-time PM compliance demonstrations for emission points 200G(1-4), 201(A-F), 202A, and 202S(1-4, 9&10). Since these demonstrations are based on uncontrolled PM emissions, no monitoring, record keeping, and reporting are required for these emission points. These demonstrations were submitted on November 27, 2000.
4. DuPont Dow has provided one-time PM compliance demonstrations for emission points 202D(1 through 3) that shows that the controlled PM emission limit at maximum PM handling rates can not be exceeded. Since these demonstrations are based on controlled PM emissions, there are monitoring, record keeping, and reporting for the control device (C202D) for these emission points. These demonstrations were submitted on November 27, 2000.

5. DuPont Dow has provided one-time VOC applicability compliance demonstrations for emission points 202E and 202F1. Per these demonstrations the vapor pressure as stored cannot exceed 1.5 psia; therefore, no monitoring, record keeping, and reporting are required for these emission points. These demonstrations were submitted on November 27, 2000.
6. Regulation 6.09 does not apply to insignificant activities IA-202L; IA-202N(1 through 3); IA-202P(1, 3, & 4); IA-202Q(1 through 4); and emission points 202S(5 through 8), because these are either insignificant activities or fugitive emission points. Therefore, one-time PM compliance demonstrations were not needed for these insignificant activities or emission points.
7. The District has agreed the 85% total VOC emission reduction required by Regulation 6.24 for subject emission points is an overall, plant-wide emission reduction.
8. As of June 19, 2001, the MACT standard supersedes the NSPS, and emission point (202F1) is no longer subject to the requirements of 40 CFR Part 60, Subpart Kb, but become subject instead to the requirements of 40 CFR Part 63, Subpart U.
9. As of June 19, 2001, TAPs that are also organic HAPs emitted from emission points subject to the MACT standard codified at 40 CFR Part 63, Subpart U are no longer subject to regulation as a TAP, but become subject instead to regulation under the applicable MACT standard as detailed in Additional Condition 1.a.ii.
10. Insignificant Activity IA-C202E is an odor control device that was installed voluntarily. There are no applicable monitoring, record keeping, or reporting requirements for this device.

**Emission Unit P-2 Description:** Polymerization**Applicable Regulations:**

<b>Federally Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Section(s)</b>
1.05	Compliance with Emission Standards and Maintenance Requirements	1, 2, 3, 4, & 5
6.24	Standard of Performance for Existing Sources Using Organic Materials	1, 2, 3.2, 3.3, 4, 5, & 7
6.43	Volatile Organic Compound Emission Reduction Requirements	1, 2, 3, 4, & 11
7.25	Standard of Performance for New Sources Using Volatile Organic Compounds	1, 2, 3, 4, 5
40 CFR 63 Subpart A	General Provisions	63.1 through 63.15
40 CFR 63 Subpart U	National Emission Standards for Hazardous Air Pollutant Emissions: Group I Polymers and Resins	63.480 through 63.506

<b>District Only Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Section(s)</b>
5.02	Federal Emission Standards for Hazardous Air Pollutants Adopted by Reference	2.1, 2.18, 3, 4, & 5
5.11	Standards of Performance for Existing Sources Emitting Toxic Air Pollutants	1, 2, 3, 4, 5, & 6
5.12	Standards of Performance for New Sources Emitting Toxic Air Pollutants	1, 2, 3, 4, 5
5.14	Hazardous Air Pollutants and Source Categories	1, 2, & 3

**Allowable Emissions/Components:**

<b>Emission Point</b>	<b>Description ***</b>	<b>Applicable Regulation(s)</b>	<b>Standards</b>	<b>Control Reference</b>	<b>Stack Reference</b>
203 (A-G, I, & J)	(9) Stabilizer Scale Tanks (#1-7, 9, & 10)	1.05; 6.24; 40CFR63 Subpart U	See Additional Condition 1.a.(i. & v.)	None	S203
		5.11	See Additional Condition 1.b.		

<b>Emission Point</b>	<b>Description ***</b>	<b>Applicable Regulation(s)</b>	<b>Standards</b>	<b>Control Reference</b>	<b>Stack Reference</b>
203H	Stabilizer Scale Tank (#8)	1.05; 7.25; 40CFR63 Subpart U	See Additional Condition 1.a.(iii. & v.)	None	S203
		5.11	See Additional Condition 1.b.		
204 (A-J)	(10) Large Polymerization Kettles (LPK) (#1-10)	1.05; 7.25; 6.43; 40CFR63 Subpart U	See Additional Condition 1.a.(ii., iv., & v.)	C204(A-J) (Vent Condensers)	S204 (A-J)
		5.12	See Additional Condition 1.b.		
204K	LPK Emergency Inhibitor Tank (2nd floor)	1.05; 6.24; 40CFR63 Subpart U	See Additional Condition 1.a.(i. & v.)	None	Fugitive
		5.11	See Additional Condition 1.b.		
IA <sup>1</sup> -204L(1-10)	(10) LPK Strainers (#1-10)	None (See Comment 1) (No known emissions) (Closed Vessels, opened for maintenance only)			
204L (11 & 12)	(2) LPK Collars (#1 & 2)	1.05; 6.24; 40CFR63 Subpart U	See Additional Condition 1.a.(i. & v.)	None	S204L11
		5.11	See Additional Condition 1.b.		
204L13	LPK Collar #3	1.05; 6.24; 40CFR63 Subpart U	See Additional Condition 1.a.(i. & v.)	None	S204L13
		5.11	See Additional Condition 1.b.		
204L14	LPK Collar #4	1.05; 6.24; 40CFR63 Subpart U	See Additional Condition 1.a.(i. & v.)	None	S204L14
		5.11	See Additional Condition 1.b.		
204L (15 & 16)	(2) LPK Collars (#5 & 6)	1.05; 6.24; 40CFR63 Subpart U	See Additional Condition 1.a.(i. & v.)	None	S204L5
		5.11	See Additional Condition 1.b.		

<b>Emission Point</b>	<b>Description ***</b>	<b>Applicable Regulation(s)</b>	<b>Standards</b>	<b>Control Reference</b>	<b>Stack Reference</b>
204L (17 & 18)	(2) LPK Collars (#7 & 8)	1.05; 6.24; 40CFR63 Subpart U	See Additional Condition 1.a.(i. & v.)	None	S204L7
		5.11	See Additional Condition 1.b.		
204L (19 & 20)	(2) LPK Collars (#9 & 10)	1.05; 6.24; 40CFR63 Subpart U	See Additional Condition 1.a.(i. & v.)	None	S204L9
		5.11	See Additional Condition 1.b.		
IA <sup>1</sup> -204M(1 & 2)	(2) G-Type Additive Scale Tanks (#1 & 2)	None (See Comment 1) (No known regulated emissions) (Non-volatile aqueous solution)			
IA <sup>1</sup> -204M3	G-Type Additive Hold Tank	None (See Comment 1) (No known regulated emissions) (Non-volatile aqueous solution)			

Notes: 1. Insignificant Activities, included because part of the process.

\*\*\*The description applies to plant nomenclature not regulatory nomenclature.

See Appendix A for 40 CFR 63 Subpart U requirements

**Additional Conditions**

1. **Standards** (Regulation 2.16, section 4.1.1)
  - a. **VOC** (Regulations 6.24, sections 3.2 and 3.3; 6.43, section 11; 7.25, section 3.1; and 40 CFR 63 Subpart U)
    - i. The owner or operator shall not exceed the limitation on plant-wide VOC emissions of 4377 lbs/day, from all emission points which are subject to Regulation 6.24. This is based on the March 3, 1977 Board Order (Enforcement Order) and the November 27, 2000 compliance demonstration that indicates the total VOC(s) have been reduced by at least 85% by weight for all Class II and III solvents. (Regulation 6.24, sections 3.2 & 3.3) (See Comment 2)
    - ii. For emission points 204(C through F, I, & J) only: The owner or operator shall meet the following requirements for the six large polymerization kettles, identified as numbers 3, 4, 5, 6, 9, and 10, located on the fourth floor of the East Neoprene Manufacturing Building: (Regulation 6.43, section 11.1)
      - 1) The emissions from each large polymerization kettle shall be controlled by a brine-cooled vent condenser,
      - 2) Dupont Dow shall not begin charging a large polymerization kettle with unpolymerized emulsion if the inlet brine temperature to the kettle's vent condenser is above 2°C, and
      - 3) The total VOC emitted from a large polymerization kettle shall not exceed 15.8 pounds per batch. (See Comment 3)
    - iii. The owner or operator shall not exceed the VOC emission limit of 0.135 tons per year for emission point (203H). (Regulation 7.25, section 3.1) (See Comment 4)
    - iv. The owner or operator shall not exceed the VOC emission limit of 11.9 tpy from each emission point (204A through 204J) from the BACT analysis dated February 15, 2002. (Regulation 7.25, sections 3.1) (See Comment 4)
    - v. The owner or operator shall comply with the standards as specified in 40 CFR 63 Subpart U. (See Appendix A for 40 CFR 63 Subpart U (MACT) Additional Conditions)
  - b. **TAP** (Regulation 5.11, section 1; and 5.12, section 1)

For all Toxic Air Pollutants (TAPs) that are not regulated by 40 CFR 63 Subpart U: The owner or operator shall not allow or cause the TAP emissions to exceed the adjusted significant level (ASL) value, unless modeling or a RACT/BACT analysis has been submitted and approved by the District. This additional condition applies to

all TAPs emitted from emission points not subject to the MACT standard codified at 40 CFR Part 63, Subpart U, as well as to all non-organic TAP HAPs emitted from emission points subject to this MACT standard.

2. **Monitoring** (Regulation 2.16, section 4.1.9.1.2)

a. **VOC**

- i. See Additional Condition 3.a.i.
- ii. For emission points 204(C through F, I, & J) only: The owner or operator shall monitor the parameters listed below on a continuous basis during periods when exhaust gases from a large polymerization kettle go to the vent condensers (C204(C through F, I, and J)): (Regulation 6.43, section 11.3)
  - 1) The vent condenser brine inlet temperature at the discharge of the cold brine pump, and
  - 2) The vent condenser brine outlet temperature at a point on each vent condenser's outlet brine connection to the return brine header.
- iii. The owner or operator shall comply with the monitoring requirements as specified in 40 CFR 63 Subpart U. (See Appendix A for 40 CFR 63 Subpart U (MACT) Additional Conditions)

b. **TAP**

See Additional Condition 3.b.

3. **Record Keeping** (Regulation 2.16, section 4.1.9.2)

a. **VOC** (Regulation 1.05, section 4, and 40 CFR 63 Subpart U)

- i. When any charges are processed, the number of charges processed shall be recorded daily. This value shall be used to demonstrate compliance with Additional Conditions 1.a.i., with emissions calculated in a manner similar to the methodology presented in DuPont Dow's Regulation 6.24 compliance demonstration.
- ii. For emission points 204(C through F, I, & J) that are subject to Regulation 6.43:
  - 1) The operating data showing compliance with the DuPont Dow standard operating procedures and standard operating conditions for each batch processed in a large polymerization kettle shall be recorded and maintained on site at DuPont Dow. These data shall include the beginning and ending vent condenser brine inlet and outlet temperatures for each batch. As the vent condensers are in continuous

operation except when maintenance is being performed, a record of when maintenance is performed shall be kept. (Regulation 6.43, section 11.3.2)

- 2) There are no compliance record keeping requirements for these six large polymerization kettles, identified as numbers 3, 4, 5, 6, 9, and 10 for compliance with the limitation specified in Additional Condition 1.a.ii.3). (See Comment 3)
- iii. The owner or operator shall comply with the record keeping requirements as specified in 40 CFR 63 Subpart U. (See Appendix A for 40 CFR 63 Subpart U (MACT) Additional Conditions)

b. **TAP**

The owner or operator shall evaluate process changes to demonstrate that the emission levels established during compliance demonstrations are not exceeded. The owner or operator shall document these evaluations, and make these records available to the District upon request. If there is a net emission increase, the owner or operator shall demonstrate that this net emission increase will not exceed the adjusted significant level (ASL), based on potential to emit (PTE). This additional condition applies to all TAPs emitted from emission points not subject to the MACT standard codified at 40 CFR Part 63, Subpart U, as well as to all non-organic TAP HAPs emitted from emission points subject to the cited MACT standard.

4. **Reporting** (Regulation 2.16, section 4.1.9.3)

The owner or operator shall clearly identify all deviations from permit requirements in the semi-annual reports. If no deviations occur in that reporting period then the owner or operator shall report a negative declaration for the following category:

a. **VOC**

- i. For emission points subject to Regulation 6.24:
  - 1) Emission unit ID number and emission point ID number
  - 2) The beginning and ending date of the reporting period
  - 3) Total plant-wide VOC emissions averaged for each day in a calendar month
  - 4) Identification of all periods of exceedance of the VOC emission limit
  - 5) Description of any corrective action taken for each exceedance
- ii. For emission points subject to Regulation 6.43 the following must be reported **Quarterly** in a separate submittal:
  - 1) Emission unit ID number and emission point ID number
  - 2) The beginning and ending date of the reporting period

- 3) Identify all periods when a large polymerization kettle was charged with unpolymerized emulsion when the vent condenser inlet brine temperature was greater than 2°C at the time the charging began
  - 4) Description of any corrective action taken for each exceedance
- iii. For emission points subject to 40 CFR Part 63 Subpart U: The owner or operator shall comply with the reporting requirements as specified in the regulation.

**b. TAP**

There are no compliance reporting requirements for these pollutants.

**Comments**

1. Insignificant Activities IA-[204L(1 through 10) & 204M(1 through 3)] are listed because they are part of the process but there are no known regulated emissions; therefore, there are no monitoring, record keeping, or reporting requirements for the purposes of Title V.
2. The District has agreed the 85% total VOC emission reduction required by Regulation 6.24 for subject emission points is an overall, plant-wide emission reduction.
3. DuPont Dow has provided a one-time VOC emission compliance demonstration for the, per batch, emission limit for the six large polymerization kettles, identified as numbers 3, 4, 5, 6, 9, and 10(204C, D, E, F, I, and J). Since this demonstration is based on controlled VOC emissions, there are monitoring, recordkeeping, and reporting requirements for the control devices for these emission points. This demonstration was submitted on December 18, 2000.
4. DuPont Dow has provided a one-time VOC compliance demonstration for emission points 203H, and 204A through 204J. Therefore, there are no monitoring, recordkeeping or reporting requirements for these emission points to demonstrate compliance with the VOC emission limit. The one-time VOC compliance demonstration was submitted on February 15, 2002.
5. As of June 19, 2001, TAPs that are also organic HAPs emitted from emission points subject to the MACT standard codified at 40 CFR Part 63, Subpart U are no longer subject to regulation as a TAP, but become subject instead to regulation under the applicable MACT standard as detailed in Additional Condition 1.a.v.

**Emission Unit P-3 Description:** Emulsion Storage

**Applicable Regulations:**

<b>Federally Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Section(s)</b>
1.05	Compliance with Emission Standards and Maintenance Requirements	1, 2, 3, 4, & 5
6.24	Standard of Performance for Existing Sources Using Organic Materials	1, 2, 3.2, 3.3, 4, 5, & 7
7.25	Standard of Performance for New Sources Using Volatile Organic Compounds	1, 2, 3, 4, 5
40 CFR 63 Subpart A	General Provisions	63.1 through 63.15
40 CFR 63 Subpart U	National Emission Standards for Hazardous Air Pollutant Emissions: Group I Polymers and Resins	63.480 through 63.506

<b>District Only Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Section(s)</b>
5.02	Federal Emission Standards for Hazardous Air Pollutants Adopted by Reference	2.1, 2.18, 3, 4, & 5
5.11	Standards of Performance for Existing Sources Emitting Toxic Air Pollutants	1, 2, 3, 4, 5, & 6
5.12	Standards of Performance for New or Modified Sources Emitting Toxic Air Pollutants	1, 2, 3, 4, & 5
5.14	Hazardous Air Pollutants and Source Categories	1, 2, & 3

**Allowable Emissions/Components:**

<b>Emission Point</b>	<b>Description ***</b>	<b>Applicable Regulation(s)</b>	<b>Standards</b>	<b>Control Reference</b>	<b>Stack Reference</b>
205A(1-3)	(3) Drop Tanks (#1-3)	1.05; 7.25; 40CFR63 Subpart U (See Comment 2)	See Additional Condition 1.a.(ii. & iii.)	None	S205A
		5.12	See Additional Condition 1.b.		

<b>Emission Point</b>	<b>Description ***</b>	<b>Applicable Regulation(s)</b>	<b>Standards</b>	<b>Control Reference</b>	<b>Stack Reference</b>
IA <sup>1</sup> -205A (4&5)	(2) Drop Tank Stripper Feed Strainers (#1&2)	None (See Comment 1) (No known emissions) (Closed Vessels, opened for maintenance only)			
205B (1-4)	(4) Aging Tanks (#1, 2, 3, & 4)	1.05; 6.24; 40CFR63 Subpart U	See Additional Condition 1.a.(i.1),2) & iii.)	None	S205B
		5.11	See Additional Condition 1.b.		
IA <sup>1</sup> -205B (5&6)	(2) Latex Stripper Feed Strainers (#1&2)	None (See Comment 1) (No known emissions) (Closed Vessels, opened for maintenance only)			
205C (1-5)	(5) Stripper Feed Tanks (#1-5) (Currently out of Service)	1.05; 6.24; 40CFR63 Subpart U	See Additional Condition 1.a.(i.1),3) & iii.)	None	S205C
		5.11	See Additional Condition 1.b.		
206A(1-4)	(4) Stripper Hold Tanks (#1,2,4,&5)	1.05; 6.24; 40CFR63 Subpart U	See Additional Condition 1.a.(i.1),4) & iii.)	None	Fugitive
		5.11	See Additional Condition 1.b.		
206B (1&2)	(2) Mix Tanks (#1&2)	1.05; 6.24; 40CFR63 Subpart U	See Additional Condition 1.a.(i.1),2) & iii.)	None	Fugitive
		5.11	See Additional Condition 1.b.		

Notes: 1. Insignificant Activities, included because part of the process.

\*\*\*The description applies to plant nomenclature not regulatory nomenclature.

See Appendix A for 40 CFR 63 Subpart U requirements

**Additional Conditions****1. Standards** (Regulation 2.16, section 4.1.1)**a. VOC** (Regulations 6.24, section 3.2 and 3.3; 7.25, section 3.1; and 40 CFR 63 Subpart U)**i.** For emission points subject to Regulation 6.24:

- 1) The owner or operator shall not exceed the limitation on plant-wide VOC emissions of 4377 lbs/day, from all emission points which are subject to Regulation 6.24. This is based on the March 3, 1977 Board Order (Enforcement Order) and the November 27, 2000 compliance demonstration that indicates the total VOC(s) have been reduced by at least 85% by weight for all Class II and III solvents. (Regulation 6.24, sections 3.2 & 3.3) (See Comment 3); in addition
- 2) The owner or operator shall limit the combined VOC emissions from emission points 205B(1 through 4) and 206B(1 & 2) to 31 tons per year. (1998 construction permit #95-98) (See Comment 2)
- 3) The owner or operator shall limit the combined VOC emissions from emission points 205C(1 through 5) to 26 tons per year. (1998 construction permit #95-98) (See Comment 2)
- 4) The owner or operator shall limit the combined VOC emissions from emission points 206A(1 through 4) to 2.5 tons per year. (1998 construction permit #95-98) (See Comment 2)

**ii.** The owner or operator shall limit the combined VOC emissions from the three (3) drop tanks (205A1 through 205A3) to 72 tons per year or less from the BACT analysis dated February 15, 2002. (Regulation 7.25, sections 3.1 and 1998 construction permit #95-98) (See Comment 2)**iii.** The owner or operator shall comply with the standards as specified in 40 CFR 63 Subpart U. (See Appendix A for 40 CFR 63 Subpart U (MACT) Additional Conditions)**b. TAP** (Regulations 5.11 and 5.12, section 1)

For all Toxic Air Pollutants (TAPs) that are not regulated by 40 CFR 63 Subpart U: The owner or operator shall not allow or cause the TAP emissions to exceed the adjusted significant level (ASL) value, unless modeling or a RACT/BACT analysis has been submitted and approved by the District. This additional condition applies to all TAPs emitted from emission points not subject to the MACT standard codified at 40 CFR Part 63, Subpart U, as well as to all non-organic TAP HAPs emitted from emission points subject to this MACT standard.

2. **Monitoring** (Regulation 2.16, section 4.1.9.1.2)

a. **VOC**

- i. See Additional Condition 3.a.i.
- ii. The owner or operator shall comply with the monitoring requirements as specified in 40 CFR 63 Subpart U. (See Appendix A for 40 CFR 63 Subpart U (MACT) Additional Conditions)

b. **TAP**

See Additional Condition 3.b.

3. **Record Keeping** (Regulation 2.16, section 4.1.9.2)

a. **VOC** (Regulations 1.05, section 4, and 40 CFR 63 Subpart U)

- i. When any charges are processed, the number of charges processed shall be recorded daily. This value shall be used to demonstrate compliance with Additional Condition 1.a.i.[1) through 4)], with emissions calculated in a manner similar to the methodology presented in DuPont Dow's Regulation 6.24 compliance demonstration. In addition, the total VOC emissions for each calendar month shall also be calculated utilizing the same methodology.
- ii. The owner or operator shall comply with the record keeping requirements as specified in 40 CFR 63 Subpart U. (See Appendix A for 40 CFR 63 Subpart U (MACT) Additional Conditions)
- iii. For emission points 205A1, 205A2, and 205A3, there are no compliance recordkeeping requirements. (See Comment 2)

b. **TAP**

The owner or operator shall evaluate process changes to demonstrate that the emission levels established during compliance demonstrations are not exceeded. The owner or operator shall document these evaluations, and make these records available to the District upon request. If there is a net emission increase, the owner or operator shall demonstrate that this net emission increase will not exceed the adjusted significant level (ASL), based on potential to emit (PTE). This additional condition applies to all TAPs emitted from emission points not subject to the MACT standard codified at 40 CFR Part 63, Subpart U, as well as to all non-organic TAP HAPs emitted from emission points subject to the cited MACT standard.

4. **Reporting** (Regulation 2.16, section 4.1.9.3)

The owner or operator shall clearly identify all deviations from permit requirements in the semi-annual reports. If no deviations occur in that reporting period then the owner or operator shall report a negative declaration for the following category:

a. **VOC**

i. For emission points subject to Regulation 6.24:

- 1) Emission unit ID number and emission point ID number
- 2) The beginning and ending date of the reporting period
- 3) Total plant-wide VOC emissions averaged for each day in a calendar month
- 4) Individual calendar month and year to date VOC emissions in the reporting period for emission points 205B(1-4), 206B(1&2), 205C(1-5), 206A(1-4).
- 5) Identify all periods of exceedance of the VOC emission limit including the quantity of VOC emitted in excess of the limit
- 6) Description of any corrective action taken for each exceedance.

ii. For emission points subject to Regulation 7.25, there are no compliance reporting requirements. (See Comment 2)

iii. For emission points subject to 40 CFR Part 63 Subpart U: The owner or operator shall comply with the reporting requirements as specified in the regulation.

b. **TAP**

There are no compliance reporting requirements for these pollutants.

### Comments

1. Insignificant Activities IA-[205A(4&5) & 205B(5&6)] are listed because they are part of the process but there are no known regulated emissions; therefore, there are no monitoring, record keeping, or reporting requirements for the purposes of Title V.
2. The three drop tanks [emission points 205A(1-3)] replaced the stripper feed tanks [emission points 205C(1-5)] and eliminated the need to transfer emulsion that will be dried through the aging tanks. These tanks are not considered a replacement in kind of existing equipment. This equipment change did not increase emissions, therefore, did not meet the definition of modification nor did the installation of these new tanks meet the criteria for reconstruction. These tanks allowed the company to eliminate a second tank-to-tank transfer of in process materials, thus, achieving an actual emission reduction without increasing capacity. The 131.5 tons per year is from the sum of all the allowable emission limits listed in Additional Conditions 1.a.i.(2), 3), & 4)] and 1.a.ii. as indicated in the June 11, 1998 letter from the company.

These drop tanks are surge control vessels between the reactor and the strippers. Batch front end process vents are defined as points of emission from batch unit operations. Since

unit operation is defined in 40 CFR 63.482 and 63.101 as a change in the physical or chemical characteristics of the process stream and that does not occur in these vessels, the vessels do not have batch front-end process vents. The definition of batch front-end process vent also excludes leaks from equipment regulated by 40 CFR 63.502 which requires compliance with 40 CFR 63 Subpart H. The Subpart H standard for surge control vessels, 40 CFR 63.170, applies to existing sources only for vessels larger than 19,808 gallons. For these reasons, these tanks are not subject to any monitoring, record keeping, and reporting requirements under 40 CFR 63 Subpart U. Also in the February 15, 2002 submittal the source demonstrated that the 72 tpy emission limit could not be exceeded.

3. The District has agreed the 85% total VOC emission reduction required by Regulation 6.24 for subject emission points is an overall, plant-wide emission reduction.
4. As of June 19, 2001, TAPs that are also organic HAPs emitted from emission points subject to the MACT standard codified at 40 CFR Part 63, Subpart U are no longer subject to regulation as a TAP, but become subject instead to regulation under the applicable MACT standard as detailed in Additional Condition 1.a.iii.

**Emission Unit P-4 Description:** Emulsion Stripping**Applicable Regulations:**

<b>Federally Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Section(s)</b>
1.05	Compliance with Emission Standards and Maintenance Requirements	1, 2, 3, 4, & 5
6.24	Standard of Performance for Existing Sources Using Organic Materials	1, 2, 3.2, 3.3, 4, 5, & 7
7.25	Standard of Performance for New Sources Using Volatile Organic Compounds	1, 2, 3, 4, 5
40 CFR 63 Subpart A	General Provisions	63.1 through 63.15
40 CFR 63 Subpart U	National Emission Standards for Hazardous Air Pollutant Emissions: Group I Polymers and Resins	63.480 through 63.506

<b>District Only Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Section(s)</b>
5.02	Federal Emission Standards for Hazardous Air Pollutants Adopted by Reference	2.1, 2.18, 3, 4, & 5
5.11	Standards of Performance for Existing Sources Emitting Toxic Air Pollutants	1, 2, 3, 4, 5, & 6
5.12	Standards of Performance for New or Modified Sources Emitting Toxic Air Pollutants	1, 2, 3, 4, & 5
5.14	Hazardous Air Pollutants and Source Categories	1, 2, & 3

**Allowable Emissions/Components:**

<b>Emission Point</b>	<b>Description ***</b>	<b>Applicable Regulation(s)</b>	<b>Standards</b>	<b>Control Reference</b>	<b>Stack Reference</b>
207A1	Stripper System #1	1.05; 6.24; 40CFR63 Subpart U	See Additional Condition 1.a.(i. & iii.)	Included with 207A2	Included with 207A3
		5.11	See Additional Condition 1.b.		

<b>Emission Point</b>	<b>Description ***</b>	<b>Applicable Regulation(s)</b>	<b>Standards</b>	<b>Control Reference</b>	<b>Stack Reference</b>
207A2	3-stage condenser system #1 (Including control device - vent condenser C207A2)	1.05; 6.24; 40CFR63 Subpart U	See Additional Condition 1.a.(i. & iii.)	C207A2 (Vent condenser #1)	Included with 207A3
		5.11	See Additional Condition 1.b.		
207A3	Hot Well #1	1.05; 6.24; 40CFR63 Subpart U	See Additional Condition 1.a.(i. & iii.)	None	S207A & Fugitive
		5.11	See Additional Condition 1.b.		
207A4	Stripper System #2	1.05; 6.24; 40CFR63 Subpart U	See Additional Condition 1.a.(i. & iii.)	Included with 207A5	Included with 207A6
		5.11	See Additional Condition 1.b.		
207A5	3-stage condenser system #2 (Including control device - vent condenser C207A5)	1.05; 6.24; 40CFR63 Subpart U	See Additional Condition 1.a.(i. & iii.)	C207A5 (Vent condenser #2)	Included with 207A6
		5.11	See Additional Condition 1.b.		
207A6	Hot Well #2	1.05; 6.24; 40CFR63 Subpart U	See Additional Condition 1.a.(i. & iii.)	None	S207A & Fugitive
		5.11	See Additional Condition 1.b.		
207A7	Stripper System #3	1.05; 6.24; 40CFR63 Subpart U	See Additional Condition 1.a.(i. & iii.)	Included with 207A8	Included with 207A9
		5.11	See Additional Condition 1.b.		

<b>Emission Point</b>	<b>Description ***</b>	<b>Applicable Regulation(s)</b>	<b>Standards</b>	<b>Control Reference</b>	<b>Stack Reference</b>
207A8	3-stage condenser system #3 (Including control device - vent condenser C207A8)	1.05; 6.24; 40CFR63 Subpart U	See Additional Condition 1.a.(i. & iii.)	C207A8 (Vent condenser #3)	Included with 207A9
		5.11	See Additional Condition 1.b.		
207A9	Hot Well #3	1.05; 6.24; 40CFR63 Subpart U	See Additional Condition 1.a.(i. & iii.)	None	S207A & Fugitive
		5.11	See Additional Condition 1.b.		
207A10	Stripper System #4	1.05; 6.24; 40CFR63 Subpart U	See Additional Condition 1.a.(i. & iii.)	Included with 207A11	Included with 207A12
		5.11	See Additional Condition 1.b.		
207A11	3-stage condenser system #4 (Including control device - vent condenser C207A11)	1.05; 6.24; 40CFR63 Subpart U	See Additional Condition 1.a.(i. & iii.)	C207A11 (Vent condenser #4)	Included with 207A12
		5.11	See Additional Condition 1.b.		
207A12	Hot Well #4	1.05; 6.24; 40CFR63 Subpart U	See Additional Condition 1.a.(i. & iii.)	None	S207A & Fugitive
		5.11	See Additional Condition 1.b.		
207A13	Stripper System #5	1.05; 6.24; 40CFR63 Subpart U	See Additional Condition 1.a.(i. & iii.)	Included with 207A14	Included with 207A15
		5.11	See Additional Condition 1.b.		

<b>Emission Point</b>	<b>Description ***</b>	<b>Applicable Regulation(s)</b>	<b>Standards</b>	<b>Control Reference</b>	<b>Stack Reference</b>
207A14	3-stage condenser system #5 (Including control device - vent condenser C207A14)	1.05; 6.24; 40CFR63 Subpart U	See Additional Condition 1.a.(i. & iii.)	C207A14 (Vent condenser #5)	Included with 207A15
		5.11	See Additional Condition 1.b.		
207A15	Hot Well #5	1.05; 6.24; 40CFR63 Subpart U	See Additional Condition 1.a.(i. & iii.)	None	S207A & Fugitive
		5.11	See Additional Condition 1.b.		
207B1	RCD Decanters (#1)	1.05; 6.24; 40CFR63 Subpart U	See Additional Condition 1.a.(i. & iii.)	None	Included with 207C1
		5.11	See Additional Condition 1.b.		
207B2	RCD Decanter (#2)	1.05; 7.25; 40CFR63 Subpart U	See Additional Condition 1.a.(ii. & iii.)	None	Included with 207C2
		5.12	See Additional Condition 1.b.		
207C (1&2)	(2) RCD Storage Tanks (#1&2)	1.05; 7.25; 40CFR63 Subpart U	See Additional Condition 1.a.(ii. & iii.)	None	S207C (1&2) respectively
		5.12	See Additional Condition 1.b.		
IA <sup>1</sup> -207D	Ammonia Supply System	None (See Comment 1) (No applicable regulation) (Ammonia supply is from pressurized cylinders)			

Notes: 1. Insignificant Activities, included because part of the process.

\*\*\*The description applies to plant nomenclature not regulatory nomenclature.

See Appendix A for 40 CFR 63 Subpart U requirements

### Additional Conditions

1. **Standards** (Regulation 2.16, section 4.1.1)
  - a. **VOC** (Regulations 6.24, section 3.2 and 3.3; 7.25, section 3.1; and 40 CFR 63 Subpart U)
    - i. The owner or operator shall not exceed the limitation on plant-wide VOC emissions of 4377 lbs/day, from all emission points which are subject to Regulation 6.24. This is based on the March 3, 1977 Board Order (Enforcement Order) and the November 27, 2000 compliance demonstration that indicates the total VOC(s) have been reduced by at least 85% by weight for all Class II and III solvents. (Regulation 6.24, sections 3.2 & 3.3) (See Comment 2)
    - ii. The owner or operator shall limit the combined VOC emissions from emission points (207B2, 207C1, and 207C2) to 2.3 tons per year or less from the BACT analysis and one-time compliance demonstration both dated February 15, 2002. (Regulation 7.25, sections 3.1) (See Comment 3)
    - iii. The owner or operator shall comply with the standards as specified in 40 CFR 63 Subpart U. (See Appendix A for 40 CFR 63 Subpart U (MACT) Additional Conditions)

- b. **TAP** (Regulation 5.11, section 1)

For all Toxic Air Pollutants (TAPs) that are not regulated by 40 CFR 63 Subpart U: The owner or operator shall not allow or cause the TAP emissions to exceed the adjusted significant level (ASL) value, unless modeling or a RACT/BACT analysis has been submitted and approved by the District. This additional condition applies to all TAPs emitted from emission points not subject to the MACT standard codified at 40 CFR Part 63, Subpart U, as well as to all non-organic TAP HAPs emitted from emission points subject to this MACT standard.

2. **Monitoring** (Regulation 2.16, section 4.1.9.1.2)
  - a. **VOC**
    - i. For emission points 207A(2, 4, 8, 11, & 14), the owner or operator shall monitor and record, on a daily basis, the brine supply temperature to the vent condensers C207A(2, 5, 8, 11, & 14) for proper operation. The brine supply temperature to the vent condensers shall be 0° Celsius or less when unstripped emulsion is being fed to the stripper system served by that vent condenser.
    - ii. For emission points 207B2 and 207C(1 & 2) subject to Regulation 7.25, there are no compliance monitoring requirements. (See Comment 3)

- iii. The owner or operator shall comply with the monitoring requirements as specified in 40 CFR 63 Subpart U. (See Appendix A for 40 CFR 63 Subpart U (MACT) Additional Conditions)

b. **TAP**

See Additional Condition 3.b.

3. **Record Keeping** (Regulation 2.16, section 4.1.9.2)

a. **VOC** (Regulation 1.05, section 4, and 40 CFR 63 Subpart U)

- i. When any stripper is in operation, the brine supply temperature to the stripper vent condensers C207A (2, 5, 8, 11, & 14) shall be recorded daily. This value shall be used to demonstrate compliance with Additional Condition 1.a.i., with emission calculated in a manner similar to the methodology presented in DuPont Dow's Regulation 6.24 compliance demonstration.
- ii. For emission points 207B2 and 207C(1 & 2) subject to Regulation 7.25, there are no compliance recordkeeping requirements. (See Comment 3)
- iii. The owner or operator shall comply with the record keeping requirements as specified in 40 CFR 63 Subpart U. (See Appendix A for 40 CFR 63 Subpart U (MACT) Additional Conditions)

b. **TAP**

The owner or operator shall evaluate process changes to demonstrate that the emission levels established during compliance demonstrations are not exceeded. The owner or operator shall document these evaluations, and make these records available to the District upon request. If there is a net emission increase, the owner or operator shall demonstrate that this net emission increase will not exceed the adjusted significant level (ASL), based on potential to emit (PTE). This additional condition applies to all TAPs emitted from emission points not subject to the MACT standard codified at 40 CFR Part 63, Subpart U, as well as to all non-organic TAP HAPs emitted from emission points subject to the cited MACT standard.

4. **Reporting** (Regulation 2.16, section 4.1.9.3)

The owner or operator shall clearly identify all deviations from permit requirements in the semi-annual reports. If no deviations occur in that reporting period then the owner or operator shall report a negative declaration for the following category:

a. **VOC**

- i. For emission points subject to Regulation 6.24:
  - 1) Emission unit ID number and emission point ID number

- 2) The beginning and ending date of the reporting period
  - 3) Total plant-wide VOC emissions averaged for each day in a calendar month
  - 4) Identification of all periods of exceedance of the VOC emission limit
  - 5) Description of any corrective action taken for each exceedance
- ii. For emission points 207B2 and 207C(1 & 2) subject to Regulation 7.25, there are no compliance reporting requirements. (See Comment 3)
  - iii. For emission points subject to 40 CFR Part 63 Subpart U: The owner or operator shall comply with the reporting requirements as specified in the regulation.
  - iv. For control devices C207A(2, 5, 8, 11, & 14):
    - 1) Emission unit ID number and control ID number
    - 2) The beginning and ending date of the reporting period
    - 3) Identification of what is being monitored
    - 4) Number and type of repairs instituted during the reporting period
    - 5) Identification of all periods of exceedance of the monitored parameter(s)
    - 6) Description of any corrective action taken for each exceedance
- b. **TAP**

There are no compliance reporting requirements for these pollutants.

#### **Comments**

1. Insignificant Activity IA-207D is listed because it is part of the process but it has no known regulated emissions; therefore, there are no monitoring, record keeping, or reporting requirements for the purposes of Title V.
2. The District has agreed the 85% total VOC emission reduction required by Regulation 6.24 for subject emission points is an overall, plant-wide emission reduction.
3. DuPont Dow has provided a one-time VOC compliance demonstration for emission points 207B2, 207C1, and 207C2. Therefore, there are no monitoring, recordkeeping, or reporting requirements. This demonstration was submitted on February 15, 2002.
4. As of June 19, 2001, TAPs that are also organic HAPs emitted from emission points subject to the MACT standard codified at 40 CFR Part 63, Subpart U are no longer subject to regulation as a TAP, but become subject instead to regulation under the applicable MACT standard as detailed in Additional Condition 1.a.iii.

**Emission Unit P-5 Description:** Latex Storage and Loading Area

**Applicable Regulations:**

<b>Federally Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Section(s)</b>
1.05	Compliance with Emission Standards and Maintenance Requirements	1, 2, 3, 4, & 5
6.24	Standard of Performance for Existing Sources Using Organic Materials	1, 2, 3.2, 3.3, 4, 5, & 7
40 CFR 63 Subpart A	General Provisions	63.1 through 63.15
40 CFR 63 Subpart U	National Emission Standards for Hazardous Air Pollutant Emissions: Group I Polymers and Resins	63.480 through 63.506

<b>District Only Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Section(s)</b>
5.02	Federal Emission Standards for Hazardous Air Pollutants Adopted by Reference	2.1, 2.18, 3, 4, & 5
5.11	Standards of Performance for Existing Sources Emitting Toxic Air Pollutants	1, 2, 3, 4, 5, & 6
5.14	Hazardous Air Pollutants and Source Categories	1, 2, & 3

**Allowable Emissions/Components:**

<b>Emission Point</b>	<b>Description**</b>	<b>Applicable Regulation(s)</b>	<b>Standards</b>	<b>Control Reference</b>	<b>Stack Reference</b>
208A	Latex Storage Tank #1	1.05; 6.24; 40CFR63 Subpart U	See Additional Conditions 1.a.(i. & ii.)	None	S208A (1,2,&3)
		5.11	See Additional Condition 1.b.		
208B	Latex Storage Tank #2	1.05; 6.24; 40CFR63 Subpart U	See Additional Conditions 1.a. (i. & ii.)	None	S208A1, S202B2, S208B3
		5.11	See Additional Condition 1.b.		

<b>Emission Point</b>	<b>Description**</b>	<b>Applicable Regulation(s)</b>	<b>Standards</b>	<b>Control Reference</b>	<b>Stack Reference</b>
208C	Latex Storage Tank #3	1.05; 6.24; 40CFR63 Subpart U	See Additional Conditions 1.a.(i. & ii.)	None	S208A1, S208C2, S208C3
		5.11	See Additional Condition 1.b.		
208D	Latex Storage Tank #4	1.05; 6.24; 40CFR63 Subpart U	See Additional Conditions 1.a.(i. & ii.)	None	S208A1, S208D2, S208D3
		5.11	See Additional Condition 1.b.		
208E	Latex Storage Tank #5	1.05; 6.24; 40CFR63 Subpart U	See Additional Conditions 1.a.(i. & ii.)	None	S208A1, S208E2, S208E3
		5.11	See Additional Condition 1.b.		
208F	Latex Storage Tank #6	1.05; 6.24; 40CFR63 Subpart U	See Additional Conditions 1.a.(i. & ii.)	None	S208F (1,2,&3)
		5.11	See Additional Condition 1.b.		
208G	Latex Storage Tank #7	1.05; 6.24; 40CFR63 Subpart U	See Additional Conditions 1.a.(i. & ii.)	None	S208F1, S208G2, S208G3
		5.11	See Additional Condition 1.b.		
208H	Latex Storage Tank #8	1.05; 6.24; 40CFR63 Subpart U	See Additional Conditions 1.a.(i. & ii.)	None	S208F1, S208H2, S208H3
		5.11	See Additional Condition 1.b.		
208I	Latex Storage Tank #9	1.05; 6.24; 40CFR63 Subpart U	See Additional Conditions 1.a.(i. & ii.)	None	S208F1, S208I2, S208I3
		5.11	See Additional Condition 1.b.		
208J	Latex Storage Tank #10	1.05; 6.24; 40CFR63 Subpart U	See Additional Conditions 1.a.(i. & ii.)	None	S208J (1 & 2)

<b>Emission Point</b>	<b>Description**</b>	<b>Applicable Regulation(s)</b>	<b>Standards</b>	<b>Control Reference</b>	<b>Stack Reference</b>
		5.11	See Additional Condition 1.b.		
208K	Latex Storage Tank #11	1.05; 6.24; 40CFR63 Subpart U	See Additional Conditions 1.a.(i. & ii.)	None	S208K (1 & 2)
		5.11	See Additional Condition 1.b.		
208L	Latex Storage Tank #12	1.05; 6.24; 40CFR63 Subpart U	See Additional Conditions 1.a.(i. & ii.)	None	S208L (1&2)
		5.11	See Additional Condition 1.b.		
208M	Latex Storage Tank #13	1.05; 6.24; 40CFR63 Subpart U	See Additional Conditions 1.a.(i. & ii.)	None	S208L1, S208M2
		5.11	See Additional Condition 1.b.		
208N	Latex Storage Tank #14	1.05; 6.24; 40CFR63 Subpart U	See Additional Conditions 1.a.(i. & ii.)	None	S208L1, S208N2
		5.11	See Additional Condition 1.b.		
208O	Latex Storage Tank #15	1.05; 6.24; 40CFR63 Subpart U	See Additional Conditions 1.a.(i. & ii.)	None	S208L1, S208O2
		5.11	See Additional Condition 1.b.		
208 (P, Q, R, & S)	(4) Latex Storage Tanks (#16, 17, 18, & 19)	1.05; 6.24; 40CFR63 Subpart U	See Additional Conditions 1.a.(i. & ii.)	None	None
		5.11	See Additional Condition 1.b.		
208T	Latex Storage Tank #20	1.05; 6.24; 40CFR63 Subpart U	See Additional Conditions 1.a.(i. & ii.)	None	S208T
		5.11	See Additional Condition 1.b.		

<b>Emission Point</b>	<b>Description**</b>	<b>Applicable Regulation(s)</b>	<b>Standards</b>	<b>Control Reference</b>	<b>Stack Reference</b>
208U	Latex Storage Tank #21	1.05; 6.24; 40CFR63 Subpart U	See Additional Conditions 1.a.(i. & ii.)	None	S208U
		5.11	See Additional Condition 1.b.		
208V	Latex Storage Tank #22	1.05; 6.24; 40CFR63 Subpart U	See Additional Conditions 1.a.(i. & ii.)	None	S208V
		5.11	See Additional Condition 1.b.		
208W	Latex Storage Tank #23	1.05; 6.24; 40CFR63 Subpart U	See Additional Conditions 1.a.(i. & ii.)	None	S208W
		5.11	See Additional Condition 1.b.		
IA <sup>1</sup> -208X (1&2)	(2) Truck Loading Stations (#1&2)	None (See Comment 1) (Not a volatile organic material. True vapor pressure of residual organics in material as stored is always less than 1.5 psia) (No applicable regulation) (Emissions accounted for at Latex Storage Tanks)			
IA <sup>1</sup> -208X (3,4,&5)	(3) Latex Railcar Loading Stations (#1,2,&3) (Currently out of service)	None (See Comment 1) (Not a volatile organic material. True vapor pressure of residual organics in material as stored is always less than 1.5 psia) (No applicable regulation) (Emissions accounted for at Latex Storage Tanks)			
208X 6	Drumming Station (Emissions accounted for with Latex Storage Tanks)	1.05; 6.24; 40CFR63 Subpart U	See Additional Conditions 1.a.(i. & ii.)	None	S208X6
		5.11	See Additional Condition 1.b.		
IA <sup>1</sup> -208X (7 & 8)	(2) Latex Strainers (#1 & 2)	None (See Comment 1) (Closed pressure vessel) (No known regulated pollutants) (Stripped or full conversion latex products containing low residual levels of VOCs. Closed during normal process operations, opened for maintenance only)			
IA <sup>1</sup> -208Y	Serum Interface Tank	None (See Comment 1) (No known regulated pollutants) (Aqueous solution)			

Emission Point	Description* **	Applicable Regulation(s)	Standards	Control Reference	Stack Reference
208Z (1&2)	(2) Latex Scale Tanks (#1&2) (Currently out of service)	1.05; 6.24; 40CFR63 Subpart U	See Additional Conditions 1.a.(i. & ii.)	None	Fugitive
		5.11	See Additional Condition 1.b.		

Notes: 1. Insignificant Activities, included because part of the process.

\*\*\*The description applies to plant nomenclature not regulatory nomenclature.

See Appendix A for 40 CFR 63 Subpart U requirements

**Additional Conditions**

1. **Standards** (Regulation 2.16, section 4.1.1)
  - a. **VOC** (Regulations 6.24, sections 3.2 & 3.3; and 40 CFR 63 Subpart U)
    - i. The owner or operator shall not exceed the limitation on plant-wide VOC emissions of 4377 lbs/day, from all emission points which are subject to Regulation 6.24. This is based on the March 3, 1977 Board Order (Enforcement Order) and the November 27, 2000 compliance demonstration that indicates the total VOC(s) have been reduced by at least 85% by weight for all Class II and III solvents. (Regulation 6.24, sections 3.2 & 3.3) (See Comment 3)
    - ii. The owner or operator shall comply with the standards as specified in 40 CFR 63 Subpart U. (See Appendix A for 40 CFR 63 Subpart U (MACT) Additional Conditions)
  - b. **TAP** (Regulation 5.11, section 1)

For all Toxic Air Pollutants (TAPs) that are not regulated by 40 CFR 63 Subpart U: The owner or operator shall not allow or cause the TAP emissions to exceed the adjusted significant level (ASL) value, unless modeling or a RACT/BACT analysis has been submitted and approved by the District. This additional condition applies to all TAPs emitted from emission points not subject to the MACT standard codified at 40 CFR Part 63, Subpart U, as well as to all non-organic TAP HAPs emitted from emission points subject to this MACT standard.
2. **Monitoring** (Regulation 2.16, section 4.1.9.1.2)
  - a. **VOC**
    - i. See Additional Condition 3.a.
    - ii. The owner or operator shall comply with the monitoring requirements as specified in 40 CFR 63 Subpart U. (See Appendix A for 40 CFR 63 Subpart U (MACT) Additional Conditions)
  - b. **TAP**

See Additional Condition 3.b.
3. **Record Keeping** (Regulation 2.16, section 4.1.9.2)
  - a. **VOC** (Regulations 1.05, section 4; and 40 CFR 63 Subpart U)
    - i. When any charges are processed, the number of charges processed shall be recorded daily. This value shall be used to demonstrate compliance with

Additional Condition 1.a.i., with emissions calculated in a manner similar to the methodology presented in DuPont Dow's Regulation 6.24 compliance demonstration.

- ii. The owner or operator shall comply with the record keeping requirements as specified in 40 CFR 63 Subpart U. (See Appendix A for 40 CFR 63 Subpart U (MACT) Additional Conditions)

**b. TAP**

The owner or operator shall evaluate process changes to demonstrate that the emission levels established during compliance demonstrations are not exceeded. The owner or operator shall document these evaluations, and make these records available to the District upon request. If there is a net emission increase, the owner or operator shall demonstrate that this net emission increase will not exceed the adjusted significant level (ASL), based on potential to emit (PTE). This additional condition applies to all TAPs emitted from emission points not subject to the MACT standard codified at 40 CFR Part 63, Subpart U, as well as to all non-organic TAP HAPs emitted from emission points subject to the cited MACT standard.

**4. Reporting** (Regulation 2.16, section 4.1.9.3)

The owner or operator shall clearly identify all deviations from permit requirements in the semi-annual reports. If no deviations occur in that reporting period then the owner or operator shall report a negative declaration for the following category:

**a. VOC**

- i. For emission points subject to Regulation 6.24:
  - 1) Emission unit ID number and emission point ID number
  - 2) The beginning and ending date of the reporting period
  - 3) Total plant-wide VOC emissions averaged for each day in a calendar month
  - 4) Identification of all periods of exceedance of the VOC emission limit
  - 5) Description of any corrective action taken for each exceedance
- ii. For emission points subject to 40 CFR Part 63 Subpart U: The owner or operator shall comply with the reporting requirements as specified in the regulation.

**b. TAP**

There are no compliance reporting requirements for these pollutants.

**Comments**

1. Insignificant Activities IA-[208X(1-5, & 7-8), & 208Y] are listed because they are part of the process but there are no known regulated emissions; therefore, there are no monitoring, record keeping, or reporting requirements for the purposes of Title V.
2. DuPont Dow has provided a one-time volatile organic material (VOM) nonapplicability compliance demonstration for insignificant activities IA-208X(1 through 5). Per this demonstration the vapor pressure of residual volatile organics in latex products as stored cannot exceed 1.5 psia; therefore, the latex products are not defined as a VOM in Regulation 6.22, and no monitoring, record keeping, and reporting are required. These activities are exempt from Regulation 6.22 and are insignificant. This demonstration was submitted on November 27, 2000.
3. The District has agreed the 85% total VOC emission reduction required by Regulation 6.24 for subject emission points is an overall, plant-wide emission reduction.
4. As of June 19, 2001, TAPs that are also organic HAPs emitted from emission points subject to the MACT standard codified at 40 CFR Part 63, Subpart U are no longer subject to regulation as a TAP, but become subject instead to regulation under the applicable MACT standard as detailed in Additional Condition 1.a.ii.

**Emission Unit F-1 Description:** Final Mixing and Blending**Applicable Regulations:**

<b>Federally Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Section(s)</b>
1.05	Compliance with Emission Standards and Maintenance Requirements	1, 2, 3, 4, & 5
6.09	Standards of Performance for Existing Process Operations	1, 2, & 3
6.24	Standard of Performance for Existing Sources Using Organic Materials	1, 2, 3.2, 3.3, 4, 5, & 7
7.08	Standards of Performance for New Process Operations	1, 2, & 3
40 CFR 63 Subpart A	General Provisions	63.1 through 63.15
40 CFR 63 Subpart U	National Emission Standards for Hazardous Air Pollutant Emissions: Group I Polymers and Resins	63.480 through 63.506

<b>District Only Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Section(s)</b>
5.02	Federal Emission Standards for Hazardous Air Pollutants Adopted by Reference	2.1, 2.18, 3, 4, & 5
5.11	Standards of Performance for Existing Sources Emitting Toxic Air Pollutants	1, 2, 3, 4, 5, & 6
5.14	Hazardous Air Pollutants and Source Categories	1, 2, & 3

**Allowable Emissions/Components:**

<b>Emission Point</b>	<b>Description ***</b>	<b>Applicable Regulation(s)</b>	<b>Standards</b>	<b>Control Reference</b>	<b>Stack Reference</b>
300 (A-D)	(4) Mix Tanks (#7-10)	1.05; 6.24; 40CFR63 Subpart U	See Additional Conditions 1.a.(i. & ii.)	None	Fugitive
		5.11	See Additional Condition 1.b.		
301 (A-D)	(4) Blend Tanks (#1-4)	1.05; 6.24; 40CFR63 Subpart U	See Additional Conditions 1.a.(i. & ii.)	None	Fugitive
		5.11	See Additional Condition 1.b.		
301E	Raw Material Scale	6.09	See Additional Conditions 1.(c. & d.)	C301E (Filter)	S301E
301F1	Solution Make-up Tank #1	7.08	See Additional Conditions 1.(c. & d.)	C301F (Filter)	S301F
301F (2 & 3)	(2) Additive Make-up Tanks (#1 & 2)	1.05; 6.24; 40CFR63 Subpart U	See Additional Conditions 1.a.(i. & ii.)	C301F (Filter) (PM only)	S301F
		7.08	See Additional Conditions 1.(c. & d.)		
301G (1 & 2)	(2) Additive Feed Tanks (#1 & 2)	1.05; 6.24; 40CFR63 Subpart U	See Additional Conditions 1.a.(i. & ii.)	None	Fugitive
301H	Additive Scale Tank #1	1.05; 6.24; 40CFR63 Subpart U	See Additional Conditions 1.a.(i. & ii.)	None	Fugitive
301I (1 & 2)	(2) Acetic Acid Tanks (#1 & 2)	1.05; 6.24; 40CFR63 Subpart U	See Additional Conditions 1.a.(i. & ii.)	None	S301I
		5.11	See Additional Condition 1.b.		
IA <sup>1</sup> -301J	Dispersant Make-up Tank	None (See Comment 1) (No known regulated pollutants) (Dilution of purchased aqueous solution)			

<b>Emission Point</b>	<b>Description ***</b>	<b>Applicable Regulation(s)</b>	<b>Standards</b>	<b>Control Reference</b>	<b>Stack Reference</b>
301K (1-3)	(3) Finishing Lines (#1-3)	1.05; 6.24; 40CFR63 Subpart U	See Additional Conditions 1.a.(i. & ii.)	None	S301K1
		5.11	See Additional Condition 1.b.		
301K (4-7)	(4) Finishing Lines (#4-6, & 8)	1.05; 6.24; 40CFR63 Subpart U	See Additional Conditions 1.a.(i. & ii.)	None	S301K2
		5.11	See Additional Condition 1.b.		
IA <sup>1</sup> -301L (1 & 2)	(2) Lubricating Oil Tanks (#1 & 2)	None (See Comment 1) (No applicable regulation) (Storage of lubricating oil with vapor pressure less than 10 mm Hg at 20° C)			
IA <sup>1</sup> -301M	Hot Water Tank	None (See Comment 1) (No known regulated pollutants)			
IA <sup>1</sup> -301N	Condensate Recovery Tank	None (See Comment 1) (No known regulated pollutants)			

Notes: 1. Insignificant Activities, included because part of the process.

\*\*\*The description applies to plant nomenclature not regulatory nomenclature.

See Appendix A for 40 CFR 63 Subpart U requirements

### Additional Conditions

1. **Standards** (Regulation 2.16, section 4.1.1)

a. **VOC** (Regulations 6.24, section 3.2 and 3.3; 7.25, section 3.1; and 40 CFR 63 Subpart U)

i. The owner or operator shall not exceed the limitation on plant-wide VOC emissions of 4377 lbs/day, from all emission points which are subject to Regulation 6.24. This is based on the March 3, 1977 Board Order (Enforcement Order) and the November 27, 2000 compliance demonstration that indicates the total VOC(s) have been reduced by at least 85% by weight for all Class II and III solvents. (Regulation 6.24, sections 3.2 & 3.3) (See Comment 4)

ii. The owner or operator shall comply with the standards as specified in 40 CFR 63 Subpart U. (See Appendix A for 40 CFR 63 Subpart U (MACT) Additional Conditions)

b. **TAP** (Regulation 5.11, section 1)

For all Toxic Air Pollutants (TAPs) that are not regulated by 40 CFR 63 Subpart U: The owner or operator shall not allow or cause the TAP emissions to exceed the adjusted significant level (ASL) value, unless modeling or a RACT/BACT analysis has been submitted and approved by the District. This additional condition applies to all TAPs emitted from emission points not subject to the MACT standard codified at 40 CFR Part 63, Subpart U, as well as to all non-organic TAP HAPs emitted from emission points subject to this MACT standard.

c. **PM** (Regulations 6.09, section 3.2; and 7.08, section 3.1.2)

The owner or operator shall not cause, suffer, allow, or permit the emissions into the open air of particulate matter from any affected facility that is in excess of the quantity specified in Table 1 of Regulation 6.09 or Table 1 of Regulation 7.08 as the regulatory allowable.

d. **Opacity** (Regulations 6.09, section 3.1; and 7.08, section 3.1.1)

For emission points subject to Regulation 6.09 or 7.08: The owner or operator shall not cause to be discharged into the atmosphere from any affected facility, or from any air pollution control equipment installed on any affected facility, any gases that may contain particulate matter that is equal to or greater than 20% opacity.

2. **Monitoring** (Regulation 2.16, section 4.1.9.1.2)

a. **VOC**

i. See Additional Condition 3.a.i.

- ii. The owner or operator shall comply with the monitoring requirements as specified in 40 CFR 63 Subpart U. (See Appendix A for 40 CFR 63 Subpart U (MACT) Additional Conditions)

b. **TAP**

See Additional Condition 3.b.

c. **PM**

- i. For emission point 301E: There is no compliance monitoring requirement for this emission point. (See Comment 2)
- ii. For emission points 301F (1 through 3): The owner or operator shall visually inspect, on a monthly basis, the filter (C301F), for any deterioration in the device. Any noted material failures shall have repairs instituted within 7 days after the discovery. If repairs cannot be completed within the specified time frame then a request for an extension shall be made. (See Comment 3)

d. **Opacity**

For emission points subject to the opacity standard.

- i. When charging dry solids, the owner or operator shall conduct a weekly one-minute visible emissions survey, during normal operation and daylight hours, of the PM emission points. No more than four emission points shall be observed simultaneously.
- ii. For emission points without observed visible emissions during twelve consecutive operating weeks, the owner or operator may elect to conduct a monthly one-minute visible emission survey, during normal operation and daylight hours. No more than four emission points shall be observed simultaneously.
- iii. At emission points where visible emissions are observed, the owner or operator shall initiate corrective action within eight hours of the initial observation. If the visible emissions persist, the owner or operator shall perform or cause to be performed a Method 9 within 24 hours of the initial observation. If the opacity standard is exceeded, the owner or operator shall report the exceedance to the District, according to Regulation 1.07, and take all practical steps to eliminate the exceedance. Subsequent visible emission surveys shall be conducted as indicated in item 2.d.i.

3. **Record Keeping** (Regulation 2.16, section 4.1.9.2)

- a. **VOC** (Regulation 1.05, section 4, and 40 CFR 63 Subpart U)

- i. When any charges (dry types) are processed, the number of charges (dry types) processed shall be recorded daily. This value shall be used to demonstrate compliance with Additional Condition 1.a.i., with emissions calculated in a manner similar to the methodology presented in DuPont Dow's Regulation 6.24 compliance demonstration.
- ii. The owner or operator shall comply with the record keeping requirements as specified in 40 CFR 63 Subpart U. (See Appendix A for 40 CFR 63 Subpart U (MACT) Additional Conditions)

b. **TAP**

The owner or operator shall evaluate process changes to demonstrate that the emission levels established during compliance demonstrations are not exceeded. The owner or operator shall document these evaluations, and make these records available to the District upon request. If there is a net emission increase, the owner or operator shall demonstrate that this net emission increase will not exceed the adjusted significant level (ASL), based on potential to emit (PTE). This additional condition applies to all TAPs emitted from emission points not subject to the MACT standard codified at 40 CFR Part 63, Subpart U, as well as to all non-organic TAP HAPs emitted from emission points subject to the cited MACT standard.

c. **PM**

- i. There are no compliance record keeping requirements for emission point 301E, subject to Regulation 6.09. (See Comment 2)
- ii. For emission points 301F(1, 2, & 3) subject to Regulation 7.08: The owner or operator shall record any noted material failures that required repairs to be instituted within 7 days after the discovery. If repairs cannot be completed within the specified time frame then a request for an extension shall be made. (See Comment 3)

d. **Opacity**

The owner or operator shall maintain records of the results of all visible emission surveys and tests. Records of the results of any visible emissions survey shall include the date and the time of the survey, the name of the person conducting the survey, whether or not visible emissions were observed, and what if any corrective action was performed. If an emission point is not being operated during a given week (or month, as appropriate), then no visible emission survey needs to be performed and a negative declaration may be entered in the record.

4. **Reporting** (Regulation 2.16, section 4.1.9.3)

The owner or operator shall clearly identify all deviations from permit requirements in the semi-annual reports. If no deviations occur in that reporting period then the owner or operator shall report a negative declaration for the following category:

**a. VOC**

i. For emission points subject to Regulation 6.24:

- 1) Emission unit ID number and emission point ID number
- 2) The beginning and ending date of the reporting period
- 3) Total plant-wide VOC emissions averaged for each day in a calendar month
- 4) Identification of all periods of exceedance of the VOC emission limit
- 5) Description of any corrective action taken for each exceedance

ii. For emission points subject to 40 CFR Part 63 Subpart U: The owner or operator shall comply with the reporting requirements as specified in the regulation.

**b. TAP**

There are no compliance reporting requirements for these pollutants.

**c. PM**

i. There are no compliance reporting requirements for emission point 301E, subject to Regulation 6.09. (See Comment 2)

ii. For control device C301F: (See Comment 3)

- 1) Emission unit ID number and control ID number
- 2) The beginning and ending date of the reporting period
- 3) Identification of what is being monitored
- 4) Number and type of repairs instituted during the reporting period
- 5) Description of any corrective action taken for each exceedance

**d. Opacity**

For emission points subject to Regulations 6.09 or 7.08:

- i. Emission unit ID number and emission point or stack ID number
- ii. The beginning and ending date of the reporting period
- iii. The date, time and results of each Method 9 that exceeded the opacity standard
- iv. The number of surveys where visible emissions were observed
- v. Description of any corrective action taken

**Comments**

1. Insignificant Activities IA-[301J, 301L(1&2), 301M, & 301N] are listed because they are part of the process but there are no known regulated emissions; therefore, there are no monitoring, record keeping, or reporting requirements for the purposes of Title V.

2. DuPont Dow has provided an one-time PM compliance demonstration for emission point 301E. Since this demonstration is based on uncontrolled PM emissions, no monitoring, record keeping, and reporting is required for this emission point. This demonstration was submitted on November 27, 2000.
3. DuPont Dow has provided one-time PM compliance demonstrations for emission points 301F (1 through 3). Since these demonstrations are based on controlled PM emissions; monitoring, record keeping, and reporting are required for the associated control device. These demonstrations were submitted on November 27, 2000.
4. The District has agreed the 85% total VOC emission reduction required by Regulation 6.24 for subject emission points is an overall, plant-wide emission reduction.
5. As of June 19, 2001, TAPs that are also organic HAPs emitted from emission points subject to the MACT standard codified at 40 CFR Part 63, Subpart U are no longer subject to regulation as a TAP, but become subject instead to regulation under the applicable MACT standard as detailed in Additional Condition 1.a.ii.

**Emission Unit F-2 Description:** Product Dryers**Applicable Regulations:**

<b>Federally Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Section(s)</b>
1.05	Compliance with Emission Standards and Maintenance Requirements	1, 2, 3, 4, & 5
6.24	Standard of Performance for Existing Sources Using Organic Materials	1, 2, 3.2, 3.3, 4, 5, & 7
7.08	Standards of Performance for New Process Operations	1, 2, & 3
40 CFR 63 Subpart A	General Provisions	63.1 through 63.15
40 CFR 63 Subpart U	National Emission Standards for Hazardous Air Pollutant Emissions: Group I Polymers and Resins	63.480 through 63.506

<b>District Only Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Section(s)</b>
5.02	Federal Emission Standards for Hazardous Air Pollutants Adopted by Reference	2.1, 2.18, 3, 4, & 5
5.11	Standards of Performance for Existing Sources Emitting Toxic Air Pollutants	1, 2, 3, 4, 5, & 6
5.14	Hazardous Air Pollutants and Source Categories	1, 2, & 3

**Allowable Emissions/Components:**

<b>Emission Point</b>	<b>Description*</b> <b>**</b>	<b>Applicable Regulation(s)</b>	<b>Standards</b>	<b>Control Reference</b>	<b>Stack Reference</b>
302 (A-G)	(7) Dryers (#1-6, & 8)	1.05; 6.24; 40CFR63 Subpart U	See Additional Conditions 1.a.(i. & ii.)	None	S302(A-G) S303(A-G) S304(A-G) (Each Dryer has 3 stacks)
		5.11	See Additional Condition 1.b.		
IA <sup>1</sup> -302 (H-N)	(7) Ropers (#1-7)	None (See Comment 1) (No known regulated pollutants)			

<b>Emission Point</b>	<b>Description* **</b>	<b>Applicable Regulation(s)</b>	<b>Standards</b>	<b>Control Reference</b>	<b>Stack Reference</b>
302 (O, P, &Q)	(3) Cutters (C, F, & D)	7.08	See Additional Conditions 1.(c. & d.)	C306 (A&B)(Baghouses); & C306 (C&D) (Secondary Filters) <sup>2</sup>	S306 (A&B) <sup>3</sup>

- Notes: 1. Insignificant Activities, included because part of the process.  
2. All of the listed control devices are shared by emission units F-2 and F-3.  
3. Stacks are shared by emission units F-2 and F-3.  
\*\*\*The description applies to plant nomenclature not regulatory nomenclature.

**Additional Conditions**1. **Standards** (Regulation 2.16, section 4.1.1)a. **VOC** (Regulations 6.24, section 3.2 and 3.3; and 40 CFR 63 Subpart U)

- i. The owner or operator shall not exceed the limitation on plant-wide VOC emissions of 4377 lbs/day, from all emission points which are subject to Regulation 6.24. This is based on the March 3, 1977 Board Order (Enforcement Order) and the November 27, 2000 compliance demonstration that indicates the total VOC(s) have been reduced by at least 85% by weight for all Class II and III solvents. (Regulation 6.24, sections 3.2 & 3.3) (See Comment 4)
- ii. The owner or operator shall comply with the standards as specified in 40 CFR 63 Subpart U. (See Appendix A for 40 CFR 63 Subpart U (MACT) Additional Conditions)

b. **TAP** (Regulation 5.11, section 1)

For all Toxic Air Pollutants (TAPs) that are not regulated by 40 CFR 63 Subpart U: The owner or operator shall not allow or cause the TAP emissions to exceed the adjusted significant level (ASL) value, unless modeling or a RACT/BACT analysis has been submitted and approved by the District. This additional condition applies to all TAPs emitted from emission points not subject to the MACT standard codified at 40 CFR Part 63, Subpart U, as well as to all non-organic TAP HAPs emitted from emission points subject to this MACT standard.

c. **PM** (Regulation 7.08, section 3.1.2)

The owner or operator shall not cause, suffer, allow, or permit the emissions into the open air of particulate matter from any affected facility that is in excess of the quantity specified in Table 1 of Regulation 7.08 as the regulatory allowable.

d. **Opacity** (Regulation 7.08, section 3.1.1)

For emission points subject to Regulation 7.08: The owner or operator shall not cause to be discharged into the atmosphere from any affected facility, or from any air pollution control equipment installed on any affected facility, any gases that may contain particulate matter that is equal to or greater than 20% opacity.

2. **Monitoring** (Regulation 2.16, section 4.1.9.1.2)a. **VOC**

- i. See Additional Condition 3.a.i.

- ii. The owner or operator shall comply with the monitoring requirements as specified in 40 CFR 63 Subpart U. (See Appendix A for 40 CFR 63 Subpart U (MACT) Additional Conditions)
  - b. **TAP**  
  
See Additional Condition 3.b.
  - c. **PM**  
  
For control devices C306(A through D): See emission unit F-3 Additional Condition 2.a. (See Comment 2)
  - d. **Opacity**  
  
For emission points subject to Regulation 7.08: See emission unit F-3 Additional Condition 2.b. (See Comment 3)
- 3. **Record Keeping** (Regulation 2.16, section 4.1.9.2)
  - a. **VOC** (Regulations 1.05, section 4, and 40 CFR 63 Subpart U)
    - i. When any charges (dry types) are processed, the number of charges (dry types) processed shall be recorded daily. This value shall be used to demonstrate compliance with Additional Condition 1.a.i., with emissions calculated in a manner similar to the methodology presented in DuPont Dow's Regulation 6.24 compliance demonstration.
    - ii. The owner or operator shall comply with the record keeping requirements as specified in 40 CFR 63 Subpart U. (See Appendix A for 40 CFR 63 Subpart U (MACT) Additional Conditions)
  - b. **TAP**  
  
The owner or operator shall evaluate process changes to demonstrate that the emission levels established during compliance demonstrations are not exceeded. The owner or operator shall document these evaluations, and make these records available to the District upon request. If there is a net emission increase, the owner or operator shall demonstrate that this net emission increase will not exceed the adjusted significant level (ASL), based on potential to emit (PTE). This additional condition applies to all TAPs emitted from emission points not subject to the MACT standard codified at 40 CFR Part 63, Subpart U, as well as to all non-organic TAP HAPs emitted from emission points subject to the cited MACT standard.
  - c. **PM**

There are no compliance record keeping requirements for emission points 302(O, P, & Q) subject to Regulation 7.08, except for the recordkeeping requirements for control devices (C306(A through D)) which are in Emission Unit F-3. (See Comment 2)

d. **Opacity**

See emission unit F-3 Additional Condition 3.b. (See Comment 3)

4. **Reporting** (Regulation 2.16, section 4.1.9.3)

The owner or operator shall clearly identify all deviations from permit requirements in the semi-annual reports. If no deviations occur in that reporting period then the owner or operator shall report a negative declaration for the following category:

a. **VOC**

i. For emission points subject to Regulation 6.24:

- 1) Emission unit ID number and emission point ID number
- 2) The beginning and ending date of the reporting period
- 3) Total plant-wide VOC emissions averaged for each day in a calendar month
- 4) Identification of all periods of exceedance of the VOC emission limit
- 5) Description of any corrective action taken for each exceedance

ii. For emission points subject to 40 CFR Part 63 Subpart U: The owner or operator shall comply with the reporting requirements as specified in the regulation.

b. **TAP**

There are no compliance reporting requirements for these pollutants.

c. **PM**

There are no compliance reporting requirements for emission points 302 (O, P, & Q) subject to Regulation 7.08, except for the recordkeeping requirements for control devices (C306(A through D)) which are in Emission Unit F-3. (See Comment 2)

d. **Opacity**

For emission points subject to Regulation 7.08: See emission unit F-3 Additional Condition 4.b. (See Comment 3)

e. For control devices C306 (A - D): See emission unit F3 Additional Condition 4.c. (See Comment 2):

**Comments**

1. Insignificant Activities IA-302 (H through N) are listed because they are part of the process but there are no known regulated emissions; therefore, there are no monitoring, record keeping, or reporting requirements for the purposes of Title V.
2. DuPont Dow has provided a one-time PM compliance demonstration for emission points 302(O, P, & Q). Since this demonstration is based on controlled PM emissions; monitoring, record keeping, and reporting are required for the associated control devices. This demonstration was submitted on November 27, 2000. The monitoring, record keeping, and reporting requirements for the associated control devices [C306(A&B) and C306(C&D)] are addressed in emission unit F-3.
3. The stacks (S306A and S306B) for emission points 302(O, P, & Q) are addressed in Emission Unit F-3. The opacity monitoring, record keeping, and reporting requirements for these emission points are addressed in emission unit F-3.
4. The District has agreed the 85% total VOC emission reduction required by Regulation 6.24 for subject emission points is an overall, plant-wide emission reduction.
5. As of June 19, 2001, TAPs that are also organic HAPs emitted from emission points subject to the MACT standard codified at 40 CFR Part 63, Subpart U are no longer subject to regulation as a TAP, but become subject instead to regulation under the applicable MACT standard as detailed in Additional Condition 1.a.ii.

**Emission Unit F-3 Description:** Packaging Operations**Applicable Regulations:**

<b>Federally Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Section(s)</b>
6.09	Standards of Performance for Existing Process Operations	1, 2, 3, & 5
7.08	Standards of Performance for New Process Operations	1, 2, & 3

**Allowable Emissions/Components:**

<b>Emission Point</b>	<b>Description ***</b>	<b>Applicable Regulation(s)</b>	<b>Standards</b>	<b>Control Reference</b>	<b>Stack Reference</b>
305 (A-D)	(4) Talc Feed Systems (#1-4) (Including receiver/feeder)	7.08	See Additional Conditions 1.a. & 1.b.	C305E (Filter)	S305
306	Talc Collection System	6.09	See Additional Conditions 1.a. & 1.b.	C306 (A&B)(Baghouses); & C306 (C&D) (Secondary Filters) <sup>2</sup>	S306 (A & B)
307 (A & B)	(2) Chip Recovery Systems (#1&2) (Including receiver/hopper)	7.08	See Additional Conditions 1.a. & 1.b.	C307C (Filter)	S307
IA <sup>1</sup> -308	Internal House Vacuum	None (See Comment 1) (No applicable regulation) (Vents inside building)			
309 (A-C)	(3) Bagging Machines (C, F, & D)	7.08	See Additional Conditions 1.a. & 1.b.	Included with 306 (Talc Collection System)	S306 (A & B)

Note: 1. Insignificant Activity, included because part of the process.  
 2. All of the listed control devices are shared by Emission Units F2 and F3.  
 \*\*\*The description applies to plant nomenclature not regulatory nomenclature.  
 See Appendix A for 40 CFR 63 Subpart U requirements

### Additional Conditions

1. **Standards** (Regulation 2.16, section 4.1.1)

a. **PM** (Regulations 6.09, section 3.2; and 7.08, section 3.1.2)

The owner or operator shall not cause, suffer, allow, or permit the emissions into the open air of particulate matter from any affected facility that is in excess of the quantity specified in Table 1 of Regulation 6.09 or Table 1 of Regulation 7.08 as the regulatory allowable.

b. **Opacity** (Regulations 6.09, section 3.1; and 7.08, section 3.1.1)

For emission points subject to Regulation 6.09 or 7.08: The owner or operator shall not cause to be discharged into the atmosphere from any affected facility, or from any air pollution control equipment installed on any affected facility, any gases that may contain particulate matter that is equal to or greater than 20% opacity.

2. **Monitoring** (Regulation 2.16, section 4.1.9.1.2)

a. **PM** (See Comment 2)

i. The owner or operator shall visually inspect, on a monthly basis, the filters [C305E; C306(C & D); and C307C], for any deterioration in the device. Any noted material failures shall have repairs instituted within 7 days after the discovery. If repairs cannot be completed within the specified time frame then a request for an extension shall be made.

ii. For baghouses C306 (A & B): The operators shall respond to broken bag detector alarms according to DuPont Dow standard operating procedures, and take corrective action as necessary.

iii. The owner or operator shall perform PM stack testing to demonstrate compliance with the PM emission limits {filters [C305E; C306(C & D); and C307C] and baghouses C306 (A & B)} in accordance with EPA reference Test Method Five (5) within the current permit cycle ( within five years).

b. **Opacity**

For emission points subject to the opacity standard.

i. When charging dry solids, the owner or operator shall conduct a weekly one-minute visible emissions survey, during normal operation and daylight hours, of the PM emission points. No more than four emission points shall be observed simultaneously.

ii. For emission points without observed visible emissions during twelve consecutive operating weeks, the owner or operator may elect to conduct a

monthly one-minute visible emission survey, during normal operation and daylight hours. No more than four emission points shall be observed simultaneously.

- iii. At emission points where visible emissions are observed, the owner or operator shall initiate corrective action within eight hours of the initial observation. If the visible emissions persist, the owner or operator shall perform or cause to be performed a Method 9 within 24 hours of the initial observation. If the opacity standard is exceeded, the owner or operator shall report the exceedance to the District, according to Regulation 1.07, and take all practical steps to eliminate the exceedance. Subsequent visible emission surveys shall be conducted as indicated in item 2.b.i.

3. **Record Keeping** (Regulation 2.16, section 4.1.9.2)

a. **PM** (See Comment 2)

- i. The owner or operator shall record any noted material failures that required repairs to be instituted within 7 days after the discovery. If repairs cannot be completed within the specified time frame then a request for an extension shall be made.
- ii. For baghouses C306 (A & B): The operators shall record any corrective action taken in response to broken bag detector alarms according to standard operating procedures.
- iii. The owner or operator shall keep records of the PM stack testing to demonstrate compliance with the PM emission limits {filters [C305E; C306(C & D); and C307C] and baghouses C306 (A & B)} in accordance with EPA reference Test Method Five (5).
- iv. The owner or operator shall keep monthly records of the talc usage and hours of operation for each emission point. They shall then calculate, monthly, the average amount of hourly PM emitted, based on the hours of actual operation of the processes during each day and the collection efficiency of any filtration devices used, to control emissions below the standard. The requirement to keep monthly records of the hours of operation can be satisfied by exception by recording when the packaging system is not in operation. If the stack test demonstrates at maximum capacity that the PM emission standard can not be exceeded then this recordkeeping requirement will no longer be required. (See Comment 3)

b. **Opacity**

The owner or operator shall maintain records of the results of all visible emission surveys and tests. Records of the results of any visible emissions survey shall include the date and the time of the survey, the name of the person conducting the survey, whether or not visible emissions were observed, and what if any corrective action

was performed. If an emission point is not being operated during a given week (or month, as appropriate), then no visible emission survey needs to be performed and a negative declaration may be entered in the record.

4. **Reporting** (Regulation 2.16, section 4.1.9.3)

The owner or operator shall clearly identify all deviations from permit requirements in the semi-annual reports. If no deviations occur in that reporting period then the owner or operator shall report a negative declaration for the following category:

a. **PM** (See Comment 2)

i. For control devices C305E, C306(A-D), and C307C:

- 1) Emission unit ID number and control ID number
- 2) The beginning and ending date of the reporting period
- 3) Identification of what is being monitored
- 4) Number and type of repairs instituted during the reporting period
- 5) Description of any corrective action taken for each exceedance

ii. The owner or operator shall submit the PM stack testing report to the District to verify the efficiencies of the control devices in accordance with EPA reference Test Method Five (5).

iii. For emission points subject to Regulation 6.09 or 7.08:

- 1) Emission unit ID number and emission point or stack ID number
- 2) The beginning and ending date of the reporting period
- 3) Identify all periods of exceedance of the PM emission standard for each emission point including the quantity of excess emissions
- 4) Description of any corrective action taken for each exceedance

b. **Opacity**

For emission points subject to Regulation 6.09 or 7.08:

- i. Emission unit ID number and emission point or stack ID number
- ii. The beginning and ending date of the reporting period
- iii. The date, time and results of each Method 9 that exceeded the opacity standard
- iv. The number of surveys where visible emissions were observed
- v. Description of any corrective action taken

### Comments

1. Insignificant Activity IA-308 is listed because it is part of the process but there are no known regulated emissions; therefore, there are no monitoring, record keeping, or reporting requirements for the purposes of Title V.

2. DuPont Dow has provided one-time PM compliance demonstrations for emission points 305(A through D), 306 [including 309(A through C) of emission unit F-3 and 302(O through Q) of emission unit F-2], and 307(A&B). Since these demonstrations are based on controlled PM emissions; monitoring, record keeping, and reporting are required for these emission points and their associated control devices. In addition these emission points required a control device efficiency of approximately 99.3% to meet the PM emission standard, therefore, PM stack testing was required to verify compliance with the PM emission standards. These demonstrations were submitted on November 27, 2000.
3. DuPont Dow uses talc to keep freshly cut, sticky Neoprene product "chips" from sticking together in the bags. To accomplish this, the facility has an extensive system of talc handling equipment which uses the baghouses (C306 (A and B)) to collect and recycle excess talc from several pieces of product handling and packaging equipment. Because the objective is product quality and customer satisfaction, rather than an intrinsic addition to the product composition, the facility has never required the finishing operation to keep detailed records of the amount of talc added to this system to maintain the system inventory at optimal levels. For the purposes of the Title V operating permit, DuPont Dow proposes to estimate talc addition rates by using existing recordkeeping systems of talc deliveries and monthly inventory of the number of talc supersacks. The monthly talc usage would be determined by weight of material delivered during a calendar month plus the change in inventory from the beginning of the month to the end of the month. The average daily or hourly talc addition rate would be calculated by dividing the monthly talc usage by the number of days or hours in the month.

**Emission Unit X-1 Description:** Wastewater Treatment

**Applicable Regulations:**

<b>Federally Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Section(s)</b>
6.09	Standards of Performance for Existing Process Operations	1, 2, 3, & 5

<b>District Only Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Section(s)</b>
5.11	Standards of Performance for Existing Sources Emitting Toxic Air Pollutants	1, 2, 3, 4, 5, & 6

**Allowable Emissions/Components:**

<b>Emission Point</b>	<b>Description ***</b>	<b>Applicable Regulation(s)</b>	<b>Standards</b>	<b>Control Reference</b>	<b>Stack Reference</b>
400 (A & B)	(2) Lime Slurry Tanks (#1 & 2)	6.09	See Additional Conditions 1.b. & c.	C400 (A & B) (Spray Hoods)	S400 (A & B)
		5.11	See Additional Condition 1.a.		

Note: \*\*\*The description applies to plant nomenclature not regulatory nomenclature.

**Additional Conditions**1. **Standards** (Regulation 2.16, section 4.1.1)a. **TAP** (Regulation 5.11, section 1)

For all Toxic Air Pollutants (TAPs): The owner or operator shall not allow or cause the TAP emissions to exceed the adjusted significant level (ASL) value, unless modeling or a RACT analysis has been submitted and approved by the District.

b. **PM** (Regulation 6.09, section 3.2)

The owner or operator shall not cause, suffer, allow, or permit the emissions into the open air of particulate matter from any affected facility that is in excess of the quantity specified in Table 1 of Regulation 6.09 as the regulatory allowable.

c. **Opacity** (Regulation 6.09, section 3.1)

For emission points subject to Regulation 6.09: The owner or operator shall not cause to be discharged into the atmosphere from any affected facility, or from any air pollution control equipment installed on any affected facility, any gases that may contain particulate matter that is equal to or greater than 20% opacity.

2. **Monitoring** (Regulation 2.16, section 4.1.9.1.2)a. **TAP**

See Additional Condition 3.a.

b. **PM**

For emission points 400 (A & B): There are no compliance monitoring requirements for these emission points. (See Comment)

c. **Opacity**

For emission points subject to the opacity standard.

i. When unloading dry solids, the owner or operator shall conduct a weekly one-minute visible emissions survey, during normal operation and daylight hours, of the PM emission points. No more than four emission points shall be observed simultaneously.

ii. For emission points without observed visible emissions during twelve consecutive operating weeks, the owner or operator may elect to conduct a monthly one-minute visible emission survey, during normal operation and daylight hours. No more than four emission points shall be observed simultaneously.

- iii. At emission points where visible emissions are observed, the owner or operator shall initiate corrective action within eight hours of the initial observation. If the visible emissions persist, the owner or operator shall perform or cause to be performed a Method 9 within 24 hours of the initial observation. If the opacity standard is exceeded, the owner or operator shall report the exceedance to the District, according to Regulation 1.07, and take all practical steps to eliminate the exceedance. Subsequent visible emission surveys shall be conducted as indicated in item 2.c.i.

3. **Record Keeping** (Regulation 2.16, section 4.1.9.2)

a. **TAP**

The owner or operator shall evaluate and document process changes to demonstrate that the emission levels established during compliance demonstrations are not exceeded; and make these records available to the District upon request. If there is a net emission increase, the owner or operator shall demonstrate that this net emission increase will not exceed the adjusted significant level (ASL), based on potential to emit (PTE).

b. **PM**

There are no compliance record keeping requirements foremission points (400A and 400B). (See Comment)

c. **Opacity**

The owner or operator shall maintain records of the results of all visible emission surveys and tests. Records of the results of any visible emissions survey shall include the date and the time of the survey, the name of the person conducting the survey, whether or not visible emissions were observed, and what if any corrective action was performed. If an emission point is not being operated during a given week (or month, as appropriate), then no visible emission survey needs to be performed and a negative declaration may be entered in the record.

4. **Reporting** (Regulation 2.16, section 4.1.9.3)

The owner or operator shall clearly identify all deviations from permit requirements in the semi-annual reports. If no deviations occur in that reporting period then the owner or operator shall report a negative declaration for the following category:

a. **TAP**

There are no compliance reporting requirements for these pollutants.

b. **PM**

For emission points (400A and 400B) subject to Regulation 6.09: There are no compliance reporting requirements. (See Comment)

c. **Opacity**

For emission points subject to Regulation 6.09:

- i. Emission unit ID number and emission point or stack ID number
- ii. The beginning and ending date of the reporting period
- iii. The date, time and results of each Method 9 that exceeded the opacity standard
- iv. The number of surveys where visible emissions were observed
- v. Description of any corrective action taken

**Comment**

DuPont Dow has provided a one-time PM compliance demonstration for emission points 400 (A & B). Since this demonstration is based on uncontrolled PM emissions; no monitoring, record keeping, and reporting are required for these emission points. This demonstration was submitted on November 27, 2000.

**Emission Unit X-2 Description:** Extruder Operations**Applicable Regulations:**

<b>Federally Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Section(s)</b>
1.05	Compliance with Emission Standards and Maintenance Requirements	1, 2, 3, 4, & 5
7.25	Standard of Performance for New Sources Using Volatile Organic Compounds	1, 2, 3.2, 4, & 5

<b>District Only Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Section(s)</b>
5.12	Standards of Performance for New or Modified Sources Emitting Toxic Air Pollutants	1, 2, 3, 4, & 5
5.14	Hazardous Air Pollutants and Source Categories	1, 2, & 3

**Allowable Emissions/Components:**

<b>Emission Point</b>	<b>Description**</b>	<b>Applicable Regulation(s)</b>	<b>Standards</b>	<b>Control Reference</b>	<b>Stack Reference</b>
405A	Extruder	1.05; 7.25	See Additional Condition 1.a.	None	S405
		5.12	See Additional Condition 1.b.		
405B	Slurry Make-up Tank	1.05; 7.25	See Additional Condition 1.a.	None	Fugitive
		5.12	See Additional Condition 1.b.		
405C	Slurry Feed Tank	1.05; 7.25	See Additional Condition 1.a.	None	Fugitive
		5.12	See Additional Condition 1.b.		
IA <sup>1</sup> -405D	Raw Material/Coagulant Make-up in totes	None (See Comment) (No applicable regulation) (Preparation of mixtures in portable containers is not regulated)			

Note: 1. Insignificant Activity, included because part of the process.

\*\*\*The description applies to plant nomenclature not regulatory nomenclature.

**Additional Conditions**

1. **Standards** (Regulation 2.16, section 4.1.1)
  - a. **VOC** (Regulation 7.25, section 3.2)

The total VOC emissions from this emission unit shall not exceed five (5) tons during any calendar year.
  - b. **TAP** (Regulation 5.12, section 1)
    - i. For toluene: The owner or operator shall not allow or cause the toluene emissions to exceed 176.9 lb/hr, on an eight-hour-average basis, as demonstrated in modeling submitted to the District in October 1987, and subsequently approved.
    - ii. For all other TAPs: The owner or operator shall not allow or cause the TAP emissions to exceed the adjusted significant level (ASL) value, unless modeling or a BACT analysis has been submitted and approved by the District.
2. **Monitoring** (Regulation 2.16, section 4.1.9.1.2)
  - a. **VOC**

See Additional Condition 3.a.
  - b. **TAP**

See Additional Condition 3.b.
3. **Record Keeping** (Regulation 2.16, section 4.1.9.2)
  - a. **VOC** (Regulation 1.05, section 4)

When the extruder is in operation, the owner or operator shall keep records of the following information to demonstrate compliance with the VOC emission limit:

    - i. Daily records of the material throughput based on production
    - ii. The composition of each material used
    - iii. The total VOC emissions for each calendar month using the information from additional conditions 3.a. (i. & ii.)
  - b. **TAP**
    - i. For Toluene: The owner or operator shall keep records showing that any process changes have not impacted the modeling parameters (including but not

limited to stack height, exhaust flow rate, maximum hourly emission rate, temperature, etc.).

- ii. For all other TAPs: The owner or operator shall evaluate process changes to demonstrate that the emission levels established during compliance demonstrations are not exceeded. The owner or operator shall document these evaluations, and make these records available to the District upon request. If there is a net emission increase, the owner or operator shall demonstrate that this net emission increase will not exceed the adjusted significant level (ASL), based on potential to emit (PTE).

4. **Reporting** (Regulation 2.16, section 4.1.9.3)

The owner or operator shall clearly identify all deviations from permit requirements in the semi-annual reports. If no deviations occur in that reporting period then the owner or operator shall report a negative declaration for the following category:

a. **VOC**

For emission points subject to Regulation 7.25:

- i. Emission unit ID number and emission point ID number
- ii. The beginning and ending date of the reporting period
- iii. Individual calendar month and year-to-date VOC emissions in the reporting period
- iv. Identify all periods of exceedance of the VOC emission limit including the quantity in excess of the limit
- v. Description of any corrective action taken for each exceedance

b. **TAP**

There are no compliance reporting requirements for these pollutants.

**Comment**

Insignificant Activity IA-405D is listed because it is part of the process but there are no known regulated emissions; therefore, there are no monitoring, record keeping, or reporting requirements for the purposes of Title V.

**Emission Unit MSC Description:** Miscellaneous Operations**Applicable Regulations:**

<b>Federally Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Section(s)</b>
6.09	Standards of Performance for Existing Process Operations	1, 2, 3, & 5
6.18	Standards of Performance for Solvent Metal Cleaning Equipment	1, 2, 3, 4.1, 4.2, 4.3.2, 4.4.2, & 4.4.3

**Allowable Emissions/Components:**

<b>Emission Point</b>	<b>Description ***</b>	<b>Applicable Regulation(s)</b>	<b>Standards</b>	<b>Control Reference</b>	<b>Stack Reference</b>
500	Non-halogenated cold solvent parts cleaners	6.18	See Additional Condition 1.a.	NA	NA
IA <sup>1</sup> -501A	Carpenter's Shop	None (See Comments 1 & 2) (No applicable regulation) (Cyclone removed from service and replaced by a non-regulated control device qualifying fully for treatment as an insignificant activity.)			
501B	Construction Carpentry Shop	6.09	See Additional Conditions 1.(b. & c.)	C501B (Cyclone)	S501B
IA <sup>1</sup> -501C	Lagger Shop	None (See Comments 1 & 2) (No applicable regulation) (Cyclone removed from service and replaced by a non-regulated control device qualifying fully for treatment as an insignificant activity.)			

Note: 1. Insignificant Activity, included because part of the process.

\*\*\*The description applies to plant nomenclature not regulatory nomenclature.

**Additional Conditions**1. **Standards** (Regulation 2.16, section 4.1.1)a. **VOC** (Regulation 6.18, section 4)

i. For emission point 500, the owner or operator shall install, maintain, and operate the control equipment as follows:

- 1) The cleaner shall be equipped with a cover.
- 2) The cleaner shall be equipped with a drainage facility such that VOC that drains off parts removed from the cleaner will return to the cleaner.
- 3) A permanent, conspicuous label summarizing the operating requirements specified in Additional Conditions 1.a.ii. shall be installed on or near the cleaner.
- 4) If used, the VOC spray shall be a fluid stream (not a fine, atomized, or shower type spray) at a pressure that does not cause excessive splashing.

ii. The owner or operator shall observe at all times the following operating requirements:

- 1) Do not dispose of waste VOC or transfer it to another party in a manner that more than 20% by weight of the waste VOC can evaporate into the atmosphere. Store waste VOC only in covered containers,
- 2) Close degreaser cover whenever not handling a part in the cleaner, and
- 3) Drain cleaned parts until dripping ceases (15 seconds is usually necessary).
- 4) Do not operate a cold cleaning degreaser with a solvent vapor pressure that exceeds 1.0 mmHg (0.019 psi) measured at 20°C (68°F).

b. **PM** (Regulation 6.09, section 3.2)

For emission point 501B, the owner or operator shall not cause, suffer, allow, or permit the emissions into the open air of particulate matter from any affected facility that is in excess of the quantity specified in Table 1 of Regulation 6.09 as the regulatory allowable.

c. **Opacity** (Regulation 6.09, section 3.1)

For emission point 501B, the owner or operator shall not cause to be discharged into the atmosphere from any affected facility, or from any air pollution control equipment installed on any affected facility, any gases that may contain particulate matter that is equal to or greater than 20% opacity.

2. **Monitoring** (Regulation 2.16, section 4.1.9.1.2)

a. **VOC**

See Additional Condition 3.a.

b. **PM**

For emission point 501B, the owner or operator shall visually inspect, on a monthly basis, the cyclone (C501B), for any deterioration in the device. Any noted material failures shall have repairs instituted within 7 days after the discovery. If repairs cannot be completed within the specified time frame then a request for an extension shall be made. (See Comment 2)

c. **Opacity**

For emission point 501B:

- i. The owner or operator shall conduct a weekly one-minute visible emissions survey, during normal operation and daylight hours, of the PM emission points. No more than four emission points shall be observed simultaneously.
- ii. For emission points without observed visible emissions during twelve consecutive operating weeks, the owner or operator may elect to conduct a monthly one-minute visible emission survey, during normal operation and daylight hours. No more than four emission points shall be observed simultaneously.
- iii. At emission points where visible emissions are observed, the owner or operator shall initiate corrective action within eight hours of the initial observation. If the visible emissions persist, the owner or operator shall perform or cause to be performed a Method 9 within 24 hours of the initial observation. If the opacity standard is exceeded, the owner or operator shall report the exceedance to the District, according to Regulation 1.07, and take all practical steps to eliminate the exceedance. Subsequent visible emission surveys shall be conducted as indicated in item 2.c.i.

3. **Record Keeping** (Regulation 2.16, section 4.1.9.2)

a. **VOC** (Regulation 6.18, section 4)

- i. For emission point 500, all persons subject to the requirements of Additional Condition 1.a.ii.4) shall maintain records that include the following for each purchase:
  - 1) The name and address of the solvent supplier,
  - 2) The date of the purchase,
  - 3) The type of the solvent, and
  - 4) The vapor pressure of the solvent measured in mm Hg at 20°C (68°F).
- ii. All records required by Additional Condition 3.a.i. shall be retained for 5 years and made available to the District upon request.

b. **PM**

For emission point 501B, the owner or operator shall record any noted material failures that required repairs to the cyclone (C501B) to be instituted within 7 days after the discovery. If repairs cannot be completed within the specified time frame then a request for an extension shall be made. (See Comment 2)

c. **Opacity**

The owner or operator shall maintain records of the results of all visible emission surveys and tests. Records of the results of any visible emissions survey shall include the date and the time of the survey, the name of the person conducting the survey, whether or not visible emissions were observed, and what if any corrective action was performed. If an emission point is not being operated during a given week (or month, as appropriate), then no visible emission survey needs to be performed and a negative declaration may be entered in the record.

4. **Reporting** (Regulation 2.16, section 4.1.9.3)

The owner or operator shall clearly identify all deviations from permit requirements in the semi-annual reports. If no deviations occur in that reporting period then the owner or operator shall report a negative declaration for the following category:

a. **VOC**

For emission point 500 subject to Regulation 6.18: There are no compliance reporting requirements.

b. **PM**

- i. For emission point 501B subject to Regulation 6.09: There are no compliance reporting requirements for this emission unit. (See Comment 2)
- ii. For control device C501B:
  - 1) Emission unit ID number and control ID number

- 2) The beginning and ending date of the reporting period
- 3) Identification of what is being monitored
- 4) Number and type of repairs instituted during the reporting period
- 5) Description of any corrective action taken for each exceedance

c. **Opacity**

For emission points subject to Regulation 6.09:

- i. Emission unit ID number and emission point or stack ID number
- ii. The beginning and ending date of the reporting period
- iii. The date, time and results of each Method 9 that exceeded the opacity standard
- iv. The number of surveys where visible emissions were observed
- v. Description of any corrective action taken

**Comments**

1. Insignificant Activities IA-501(A&C), are listed because they are part of the process but there are no known regulated emissions; therefore, there are no monitoring, record keeping, or reporting requirements for the purposes of Title V.
2. DuPont Dow has provided one-time PM compliance demonstrations for emission points 501(A through C). Subsequently, emission points 501A and 501C became insignificant activities when both existing control devices were replaced by non-regulated control devices qualifying fully for treatment as insignificant activities and redesignation as IA-501A and IA-501C. Since the demonstration for emission point 501B is based on controlled PM emissions, monitoring, record keeping, and reporting are required for control device (C501B). These demonstrations were submitted on November 27, 2000.

**Appendix A****40 CFR 63 Subpart U (MACT) Additional Conditions****1. Standards (40 CFR 63 Subpart U)****a. HAP (Non-LDAR)**

- i. For Group 2 storage vessels (101A, 101B, and 101C), the owner or operator shall maintain the calendar monthly average temperature of the material stored to less than or equal to -11.6 degrees Celsius, excluding temperature fluctuations due to transfer operations, and excluding times when any storage vessel is not storing crude chloroprene in that storage vessel only. This temperature standard will keep the maximum true vapor pressure less than the value listed in Table 3 of 40 CFR 63 Subpart U, which will keep the storage vessels in Group 2.
- ii. For Group 2 storage vessels (103A, 103B, 103C, and 103D (when 103D is in refined chloroprene service)), the owner or operator shall maintain the calendar monthly average temperature of the material stored to less than or equal to -5 degrees Celsius excluding temperature fluctuations due to transfer operations, and excluding times when any storage vessel is not storing crude chloroprene in that storage vessel only. This temperature standard will keep the maximum true vapor pressure less than the value listed in Table 3 of 40 CFR 63 Subpart U, which will keep the storage vessels in Group 2.
- iii. For Group 2 storage vessels (103E, 103F, 103G, and 103D (when 103D is in recovered chloroprene service)), the owner or operator shall maintain the calendar monthly average temperature of the material stored to less than or equal to 5 degrees Celsius excluding temperature fluctuations due to transfer operations, and excluding times when any storage vessel is not storing crude chloroprene in that storage vessel only. This temperature standard will keep the maximum true vapor pressure less than the value listed in Table 3 of 40 CFR 63 Subpart U, which will keep the storage vessels in Group 2.
- iv. For Group 2 continuous front end process vents (102E and 102F), the owner or operator shall maintain the product side exit temperature from the final product condensers to less than or equal to -2 degrees Celsius at all times when the respective refining columns (102E and 102F) are producing refined chloroprene. This will keep the continuous front end process vents TRE value above 1.0, therefore they will remain as Group 2.
- v. For Group 2 continuous front end process vent (102G), the owner or operator shall maintain the daily average operating pressure of the heels case to greater than or equal to 240mm Hg absolute at all times when either chloroprene refining column is producing refined chloroprene. This will keep the continuous front end process vents TRE value above 1.0, therefore it will remain in Group 2.

- vi. For Group 2 continuous front end process vents (207A3, 207A6, 207A9, 207A12, and 207A15), the owner or operator shall maintain the daily average brine temperature supplied to the stripper vent condensers to less than or equal to -8 degrees Celsius at all times when any stripper system (207A(1, 4, 7, 10, or 13)) is processing unstripped emulsion. This will keep the continuous front end process vents TRE value above 1.0, therefore they will remain in Group 2.

**b. HAP (LDAR)**

- i. For pumps in light liquid service, the instrument reading, as determined by the method as specified in §63.180(b) of this subpart, that defines a leak in each phase of the standard is for Phase III, an instrument reading of 5,000 parts per million or greater above background level, as specified in 40 CFR 63.180(b) and (c), for pumps handling polymerizing monomers and 1,000 parts per million or greater above background level, as specified in 40 CFR 63.180(b) and (c), for all other pumps. (40 CFR 63.163(b)(2)(iii)(A) and (C)) For pumps to which a 1,000 parts per million above background level, as specified in 40 CFR 63.180(b) and (c), leak definition applies, repair is not required unless an instrument reading of 2,000 parts per million or greater above background level, as specified in 40 CFR 63.180(b) and (c), is detected. (40 CFR 63.163(c)(3) as referenced by 40 CFR 63.502(a))
- ii. For valves in gas vapor service and/or in light liquid service, the instrument reading that defines a leak in each phase of the standard is for Phase III, an instrument reading of 500 parts per million or greater above background level, as specified in 40 CFR 63.180(b) and (c). (40 CFR 63.168(b)(iii) as referenced by 40 CFR 63.502(a))
- iii. For agitators in gas/vapor service and/or in light liquid service, an instrument reading of 10,000 parts per million or greater above background level, as specified in 40 CFR 63.180(b) and (c), indicates a leak is detected. (40 CFR 63.173(a)(2) as referenced by 40 CFR 63.502(a))
- iv. For connectors in gas/vapor and/or in light liquid service, an instrument reading of 500 parts per million or greater above background level, as specified in 40 CFR 63.180(b) and (c), indicates a leak is detected. (40 CFR 63.174(a)(2) as referenced by 40 CFR 63.502(a))
- v. For pressure relief devices in gas/vapor service that are equipped with a rupture disk upstream of the pressure relief device are exempt from the requirements of 40 CFR 63.165(a) and (b), provided the owner or operator after each pressure release, installs a rupture disk upstream of the pressure relief device as soon as practicable, but no later than 5 calendar days after each pressure release, except as provided in 40 CFR 63.171. (40 CFR 63.165(d)(1) and (2) as referenced by 40 CFR 63.502(a))
- vi. For open ended valves or lines,

- 1) Each open-ended valve or line shall be equipped with a cap, blind flange, plug, or a second valve, except as provided in 40 CFR 63.162(b) and Additional Conditions 1.b.vi.5) and 6). (40 CFR 63.167(a)(1) as referenced by 40 CFR 63.502(a))
  - 2) The cap, blind flange, plug, or second valve shall seal the open end at all times except during operations requiring process fluid flow through the open-ended valve or line, or during maintenance or repair. (40 CFR 63.167(a)(2) as referenced by 40 CFR 63.502(a))
  - 3) Each open-ended valve or line equipped with a second valve shall be operated in a manner such that the valve on the process fluid end is closed before the second valve is closed. (40 CFR 63.167(b) as referenced by 40 CFR 63.502(a))
  - 4) When a double block and bleed system is being used, the bleed valve or line may remain open during operations that require venting the line between the block valves but shall comply with 40 cfr 63.167(a) at all other times. (40 CFR 63.167(c) as referenced by 40 CFR 63.502(a))
  - 5) Open-ended valves or lines in an emergency shutdown system which are designed to open automatically in the event of a process upset are exempt from the requirements of paragraphs (a), (b) and (c) of 40 CFR 63.167. (40 CFR 63.167(d) as referenced by 40 CFR 63.502(a))
  - 6) Open-ended valves or lines containing materials which would autocatalytically polymerize or, would present an explosion, serious overpressure, or other safety hazard if capped or equipped with a double block and bleed system as specified in 40 CFR 63.167(a) through (c) are exempt from the requirements of 40 CFR 63.167(a) through (c). Chloroprene is a listed HAP that is capable of autocatalytically polymerizing, therefore it is exempt from the requirements of 40 CFR 63.167(a) through (c). (40 CFR 63.167(e) as referenced by 40 CFR 63.502(a))
- vii. If an instrument reading of 500 parts per million or greater above background level, as specified in 40 CFR 63.180(b) and (c), is measured when monitoring instrumentation systems and pressure relief devices in liquid service, then a leak is detected. (40 CFR 63.169(b) as referenced by 40 CFR 63.502(a))
- viii. Compliance with the equipment leak standard will be determined by review of the records required by 40 CFR 63.181 and the reports required by 40 CFR 63.182 of 40 CFR Part 63, Subpart H, review of performance test results, and by inspections. (40 CFR 63.162(a) as referenced by 40 CFR 63.502(a))
- ix. Each piece of equipment in a process unit to which the equipment leak standard applies shall be identified such that it can be distinguished readily from equipment that is not subject to the equipment leaks standard.

Identification of the equipment does not require physical tagging of the equipment. For example, the equipment may be identified on a plant site plan, in log entries, or by designation of process unit boundaries by some form of weatherproof identification. Equipment that is in vacuum service is excluded from the requirements of the equipment leak standard. Equipment that is in organic hazardous air pollutant service less than 300 hours per calendar year is excluded from the requirements of 40 CFR 63.163 through 63.174 and 40 CFR 63.178 of the equipment leak standard if it is identified as required in 40 CFR 63.181(j) of the standard. (40 CFR 63.162(c) through (e), as referenced by 40 CFR 63.502(a))

- x. When any leak is detected as specified in Additional Conditions b.(i. through v. and vii.), a weatherproof and readily visible identification, marked with the equipment identification number, shall be attached to the leaking equipment. The identification on a valve may be removed after it has been monitored as specified in 40 CFR 63.168(f)(3) and 63.175(e)(7)(i)(D) of 40 CFR Part 63, Subpart H, and no leak has been detected during the follow-up monitoring. If the owner or operator elects to comply using the provisions of 40 CFR 63.174(c)(1)(i) of 40 CFR Part 63, Subpart H, the identification on a connector may be removed after it is monitored as specified in 40 CFR 63.174(c)(1)(i) and no leak is detected during that monitoring. The identification which has been placed on equipment determined to have a leak, except for a valve or for a connector that is subject to the provisions of 40 CFR 63.174(c)(1)(i), may be removed after it is repaired. (40 CFR 63.162(f)(1) through (3), as referenced by 40 CFR 63.502(a))
- xi. All terms in the equipment leak standard that define a period of time for completion of required tasks (such as weekly, monthly, quarterly, or annual), refer to the standard calendar periods unless specified otherwise in the section or subsection of the standard that imposes the requirement. However, if the initial compliance date does not coincide with the beginning of the standard calendar period, an owner or operator may elect to utilize a period beginning on the compliance date, or may elect to comply in accordance with the provisions of 40 CFR 63.162(g)(2) or (g)(3). (40 CFR 63.162(g), as referenced by 40 CFR 63.502(a))
- xii. In all cases where the provisions of the equipment leak standard require an owner or operator to repair leaks by a specified time after the leak is detected, it is a violation of the equipment leak standard to fail to take action to repair the leaks within the specified time. If action is taken to repair the leaks within the specified time, failure of that action to successfully repair the leak is not a violation of the equipment leaks standard. However, if the repairs are unsuccessful, a leak is detected and the owner or operator shall take further action as required by applicable provisions of the equipment leak standard. (40 CFR 63.162(h), as referenced by 40 CFR 63.502(a))
- xiii. The owner or operator may delay the repair of equipment for which leaks have been detected if repair within 15 days is technically infeasible without a

process unit shutdown. The owner or operator shall repair such equipment by the end of the next process unit shutdown. The owner or operator may delay the repair of equipment for which leaks have been detected if the equipment is isolated from the process and does not remain in organic HAP service. The owner or operator may delay repair of valves, connectors, and agitators for which leaks have been detected if the owner or operator determines that emissions of purged material resulting from immediate repair would be greater than the fugitive emissions likely to result from delay of repair, and when repair procedures are effected, the purged material is collected and destroyed or recovered in a control device complying with 40 CFR 63.172. The owner or operator may delay repair of pumps if the repair requires replacing the existing seal design with (1) a new system that the owner or operator has determined will provide better performance under the provisions of 40 CFR 63.176(d); or (2) a dual mechanical seal system that meets the requirements of 40 CFR 63.163(e); or the repair requires replacing the pump with a pump that meets the requirements of 40 CFR 63.163(f); or the owner or operator installs a closed-vent system and control device meeting the requirements of 40 CFR 63.163(g); and such repair, replacement, or installation is completed as soon as practicable, but not later than 6 months after the leak was detected. Finally, for valves, the owner or operator may delay repair beyond a process unit shutdown if valve assembly replacement is necessary during the process unit shutdown, valve assembly supplies have been depleted, and valve assembly supplies had been sufficiently stocked before the supplies were depleted. Delay of repair for such valves beyond the second process unit shutdown will not be allowed unless the third process unit shutdown occurs sooner than 6 months after the first process unit shutdown. (40 CFR 63.171, as referenced by 40 CFR 63.502(a))

2. **Monitoring** (40 CFR 63 Subpart U)

a. **HAP (Non-LDAR)**

- i. For Group 2 storage vessels (101A, 101B, 101C, 103A, 103B, 103C, 103D, 103E, 103F, 103G) and Group 2 continuous front end process vents (S102D, S102E, S102F, and S102G)
  - 1) a) For Group 2 storage vessels 101(A through C) and 103(A through G), the owner or operator shall measure the temperature of the material stored, as specified in Additional Condition 1.a.(i. through iii), at least once every 15 minutes with a monitoring system. (40 CFR 63.506(d)(1))
  - b) For Group 2 continuous front-end process vents 102(E & F), the owner or operator shall measure the temperature of the product-side exit temperature from the final product condenser, as specified in Additional Condition 1.a.iv., at least once every 15 minutes with a monitoring system. (40 CFR

63.506(d)(1) and 40 CFR 63.114(b)(2) as referenced by 40 CFR 63.485(a))

- c) For Group 2 continuous front-end process vent 102G, the owner or operator shall monitor the absolute pressure of the heels case, as specified in Additional Condition 1.a.v., at least once every 15 minutes with a monitoring system. (40 CFR 63.506(d)(1))
  - d) For Group 2 continuous front-end process vents 207A(3, 6, 9, 12, and 15), the owner or operator shall monitor the temperature of the brine supply to the stripper vent condensers, as specified in Additional Condition 1.a.vi., at least once every 15 minutes with a monitoring system.
- 2) The owner or operator shall record either each measured data value or block average values for 1 hour or shorter periods calculated from all measured data values during each period. (40 CFR 63.506(d)(2))
  - 3) Daily average (or batch cycle daily average) values of each continuously monitored parameter shall be calculated for each operating day. (40 CFR 63.506(d)(3))
    - a) The daily average value or batch cycle daily average shall be calculated as the average of all parameter values recorded during the operating day, except as specified in 40 CFR 63.506(d)(7). The calculated average shall cover a 24-hour period if operation is continuous, or the number of hours of operation per operating day if operation is not continuous. (40 CFR 63.506(d)(3)(i))
    - b) The operating day shall be the period that the owner or operator specifies in the operating permit or the Notification of Compliance Status for purposes of determining daily average values or batch cycle daily average values of monitored parameters. This operating day was defined in the Notification of Compliance Status submitted on November 16, 2001 as 6:00 am to 6:00 am. (40 CFR 63.506(d)(3)(ii))
  - 4) If all recorded values for a monitored parameter during an operating day are above the minimum level or below the maximum level established in the Notification of Compliance Status or operating permit, the owner or operator may record that all values were above the minimum level or below the maximum level rather than calculating and recording a daily average (or batch cycle daily average) for that operating day. (40 CFR 63.506(d)(6))

- 5) Monitoring data recorded during periods identified in the following shall not be included in any average computed under 40 CFR 63 Subpart U. Records shall be kept of the times and durations of all such periods and any other periods during process or control device or recovery device operation when monitors are not operating. (40 CFR 63.506(d)(7))
  - a) Monitoring system breakdowns, repairs, calibration checks, and zero (low-level) and high-level adjustments; (40 CFR 63.506(d)(7)(i))
  - b) Start-ups; (40 CFR 63.506(d)(7)(ii))
  - c) Shutdowns; (40 CFR 63.506(d)(7)(iii))
  - d) Malfunctions; or (40 CFR 63.506(d)(7)(iv))
  - e) Periods of non-operation of the affected source (or portion thereof), resulting in cessation of the emissions to which the monitoring applies. (40 CFR 63.506(d)(7)(v))
- b. **HAP (LDAR)**
  - i. The owner or operator of a process unit subject to this subpart shall monitor each pump monthly to detect leaks by the method specified in 40 CFR 63.180(b) of this subpart and shall comply with the requirements of paragraphs (a) through (d) of 40 CFR 63.163, except as provided in 40 CFR 63.162(b) and paragraphs (e) through (j) of 40 CFR 63.163. (40 CFR 63.163(b)(1) as referenced by 40 CFR 63.502(a))
  - ii. Each pump shall be checked by visual inspection each calendar week for indications of liquids dripping from the pump seal. If there are indications of liquids dripping from the pump seal, a leak is detected. (40 CFR 63.163(b)(3) as referenced by 40 CFR 63.502(a))
    - 1) When a leak is detected, it shall be repaired as soon as practicable, but not later than 15 calendar days after it is detected, except as provided in paragraph (c)(3) of 40 CFR 63.163 or 40 CFR 63.171. (40 CFR 63.163(c)(1) as referenced by 40 CFR 63.502(a))
    - 2) A first attempt at repair shall be made no later than 5 calendar days after the leak is detected. First attempts at repair include, but are not limited to, the following practices where practicable. (40 CFR 63.163(c)(2) as referenced by 40 CFR 63.502(a))
      - a) Tightening of packing gland nuts. (40 CFR 63.163(c)(2)(i) as referenced by 40 CFR 63.502(a))

- b) Ensuring that the seal flush is operating at design pressure and temperature. (40 CFR 63.163(c)(2)(ii) as referenced by 40 CFR 63.502(a))
- 3) The owner or operator shall continue to calculate percent leaking pumps on a source-wide basis, as determined by the owner or operator no later than the first monitoring period and reported in the first Periodic Report for Equipment Leaks required by 40 CFR 63.182 as referenced by 40 CFR 63.506(e)(6). If, in Phase III and calculated on a 6-month rolling average, the greater of either 10 percent of the pumps in a process unit or three pumps in a process unit leak, the owner or operator shall implement a quality improvement program for pumps that complies with the requirements of 40 CFR 63.176. The number of pumps at a process unit shall be the sum of all the pumps in organic HAP service, except that pumps found leaking in a continuous process unit within 1 month after start-up of the pump shall not count in the percent leaking pumps calculation for that one monitoring period only. (40 CFR 63.163(d)(1) through (3), as referenced by 40 CFR 63.502(a))
- 4) Each pump equipped with a dual mechanical seal system that includes a barrier fluid system is exempt from the requirements of 40 CFR 63.162(a) through (d), provided that each dual mechanical seal system is operated with the barrier fluid at a pressure that is at all times greater than the pump stuffing box pressure; or equipped with a barrier fluid degassing reservoir that is routed to a process or fuel gas system or connected by a closed-vent system to a control device that complies with the requirements of 40 CFR 63.172; or equipped with a closed-loop system that purges the barrier fluid into a process stream. The barrier fluid shall not be in light liquid service. Each barrier fluid system shall be equipped with a sensor that will detect failure of the seal system, the barrier fluid system, or both. Each sensor shall be observed daily or equipped with an alarm unless the pump is located within the boundary of an unmanned plant site. Each pump equipped with such a dual mechanical seal system and barrier fluid system shall be checked by visual inspection each calendar week for indications of liquids dripping from the pump seal. If there are indications of liquids dripping from the pump seal at the time of the weekly inspection, the pump shall be monitored as specified in 40 CFR 63.180(b) to determine if there is a leak of organic hazardous air pollutant(s) into the barrier fluid. If an instrument reading of 1,000 parts per million or greater is measured, a leak is detected. The owner or operator shall determine, based on design considerations and operating experience, criteria applicable to the presence and frequency of drips and to the sensor that indicates failure of the seal system, the barrier fluid system, or both. If indications of liquids dripping from the pump seal exceed these criteria, or if, based on these criteria, the sensor indicates failure of the seal system, the barrier fluid system, or both, a leak is detected.

When a leak is detected, the owner or operator shall repair it as soon as practicable, but not later than 15 calendar days after it is detected, except as provided in 40 CFR 63.171. A first attempt at repair shall be made no later than 5 calendar days after each leak is detected. (40 CFR 63.163(e), including all subparagraphs, as referenced by 40 CFR 63.502(a))

- 5) Any pump that is designed with no externally actuated shaft penetrating the pump housing is exempt from the requirements of 40 CFR 63.163(a) through (c). (40 CFR 63.163(f) as referenced by 40 CFR 63.502(a))
  - 6) Any pump that is designated as an unsafe-to-monitor pump, as described in 40 CFR 63.181(b)(7)(i), is exempt from the requirements of 40 CFR 63.163(b) through (e) if the owner or operator of the pump determines that the pump is unsafe to monitor because monitoring personnel would be exposed to an immediate danger as a consequence of complying with 40 CFR 63.163(b) through (d), and the owner or operator of the pump has a written plan that requires monitoring of the pump as frequently as practical during safe-to-monitor times, but not more frequently than the periodic monitoring schedule otherwise applicable. (40 CFR 63.163(j), including all subparagraphs, as referenced by 40 CFR 63.502(a))
- iii. The owner or operator shall monitor valves for leaks at the intervals specified below: (40 CFR 63.168(d) as referenced by 40 CFR 63.502(a))
- 1) At process units with 2 percent or greater leaking valves, calculated according to paragraph (e) of 40 CFR 63.168, the owner or operator shall monitor each valve once per month. (40 CFR 63.168(d)(1)(i) as referenced by 40 CFR 63.502(a))
  - 2) At process units with less than 2 percent leaking valves, the owner or operator shall monitor each valve once each quarter, except as provided in Additional Conditions 2.b.iii.3) and 4). (40 CFR 63.168(d)(2) as referenced by 40 CFR 63.502(a))
  - 3) At process units with less than 1 percent leaking valves, the owner or operator may elect to monitor each valve once every 2 quarters. (40 CFR 63.168(d)(3) as referenced by 40 CFR 63.502(a))
  - 4) At process units with less than 0.5 percent leaking valves, the owner or operator may elect to monitor each valve once every 4 quarters. (40 CFR 63.168(d)(4) as referenced by 40 CFR 63.502(a))
  - 5) When a leak is detected, the owner or operator shall repair the leak as soon as practicable, but no later than 15 calendar days after the leak is detected, except as provided in 40 CFR 63.171. A first attempt at

repair shall be made no later than 5 calendar days after each leak is detected. When a leak has been repaired, the valve shall be monitored at least once within the first 3 months after its repair. The monitoring shall be conducted as specified in 40 CFR 63.180(b) and (c), as appropriate, to determine whether the valve has resumed leaking. In addition, any valve repaired on-line shall be monitored for two successive months after repair, using the method specified in 40 CFR 63.180(b), to satisfy the requirement of Additional Condition 1.b.x. and 40 CFR 63.175(e)(7)(i)(D). Periodic monitoring required by 40 CFR 63.168(b) through (d) may be used to satisfy the requirement to monitor the repaired valve within the first 3 months after its repair, if the timing of the monitoring period coincides with this timing. Alternatively, other monitoring may be performed to satisfy this remonitoring requirement, regardless of whether the timing of the monitoring period for periodic monitoring coincides with the time specified for this remonitoring requirement. If a leak is detected during such remonitoring, the owner or operator shall follow the provisions of 40 CFR 63.168(f)(3)(iii)(A) and (f)(3)(iii)(B) to determine whether that valve must be counted as a leaking valve for purposes of 40 CFR 63.168(e). 40 CFR 63.168(f)(3)(iii)(A) provides that if the owner or operator elected to use the periodic monitoring required by 40 CFR 63.168(b) through (d) to satisfy the remonitoring requirement, then the valve with a leak detected during the remonitoring shall be counted as a leaking valve for the purpose of calculating the percent leaking valves using the equations set forth in 40 CFR 63.168(e). 40 CFR 63.168(f)(3)(iii)(B) provides that if the owner or operator elected to use other monitoring, prior to the periodic monitoring required by 40 CFR 63.168(b) through (d), to satisfy the remonitoring requirement, then the valve shall be counted as a leaking valve unless it is repaired and shown by periodic monitoring not to be leaking. First attempts at repair include, but are not limited to, the following practices where practicable: (1) Tightening of bonnet bolts; (2) Replacement of bonnet bolts; (3) Tightening of packing gland nuts; and (4) Injection of lubricant into lubricated packing. (40 CFR 63.162(f)(2), which cross-references 40 CFR 63.175(e)(7)(1)(D), and 40 CFR 63.168(f) and (g), as referenced by 40 CFR 63.502(a))

- 6) For use in determining monitoring frequency, as specified in 40 CFR 63.168(d), the percent leaking valves shall be calculated as a rolling average of two consecutive monitoring periods for monthly, quarterly, or semiannual monitoring programs; and as an average of any three out of four consecutive monitoring periods for annual monitoring programs. Nonrepairable valves shall be included in the calculation of percent leaking valves the first time the valve is identified as leaking and nonrepairable and as required to comply with 40 CFR 63.168(e)(3)(ii). Otherwise, a number of nonrepairable valves (identified and included in the percent leaking calculation in a

previous period) up to a maximum of 1 percent of the total number of valves in organic HAP service at a process unit may be excluded from calculation of percent leaking valves for subsequent monitoring periods. 40 CFR 63.168(e)(3)(ii) provides that if the number of nonrepairable valves exceeds 1 percent of the total number of valves in organic HAP service at a process unit, the number of nonrepairable valves exceeding 1 percent of the total number of valves in organic HAP service shall be included in the calculation of percent leaking valves. (40 CFR 63.168(e)(2) and (e)(3), including subparagraphs, as referenced by 40 CFR 63.502(a))

- 7) Any valve that is designated as an unsafe-to-monitor valve, as described in 40 CFR 63.181(b)(7)(i), is exempt from the requirements of 40 CFR 63.168(b) through (f) if the owner or operator of the valve determines that the valve is unsafe to monitor because monitoring personnel would be exposed to an immediate danger as a consequence of complying with 40 CFR 63.168(b) through (d), and the owner or operator of the valve has a written plan that requires monitoring of the valve as frequently as practicable during safe-to-monitor times, but not more frequently than the periodic monitoring schedule otherwise applicable. Any valve that is designated as a difficult-to-monitor valve, as described in 40 CFR 63.181(b)(7)(ii), is exempt from the requirements of 40 CFR 63.168(b) through (d) if the owner or operator of the valve determines that the valve cannot be monitored without elevating the monitoring personnel more than 2 meters above a support surface or it is not accessible at anytime in a safe manner; the process unit within which the valve is located is an existing source; and the owner or operator of the valve follows a written plan that requires monitoring of the valve at least once per calendar year. (40 CFR 63.168(h) and (i), as referenced by 40 CFR 63.502(a))
- iv. Each agitator shall be monitored monthly to detect leaks by the methods specified in 40 CFR 63.180(b), except as provided in 40 CFR 63.162(b). (40 CFR 63.173(a)(1) as referenced by 40 CFR 63.502(a))
- v. Each agitator shall be checked by visual inspection each calendar week for indications of liquids dripping from the agitator. If there are indications of liquids dripping from the agitator, a leak is detected. (40 CFR 63.173(b) as referenced by 40 CFR 63.502(a))
  - 1) When a leak is detected, it shall be repaired as soon as practicable, but not later than 15 calendar days after it is detected, except as provided in 40 CFR 63.171. (40 CFR 63.173(c) as referenced by 40 CFR 63.502(a))
  - 2) A first attempt at repair shall be made no later than 5 calendar days after each leak is detected. (40 CFR 63.173(c)(2) as referenced by 40 CFR 63.502(a))

- vi. For connectors, the owner or operator shall perform all monitoring of connectors at the frequencies specified in the following, except as provided in paragraph (c)(2) of 40 CFR 63.171: (40 CFR 63.174(b)(3) as referenced by 40 CFR 63.502(a))
- 1) Once per year (i.e., 12-month period), if the percent leaking connectors in the process unit was 0.5 percent or greater during the last required annual or biennial monitoring period. (40 CFR 63.174(b)(3)(i) as referenced by 40 CFR 63.502(a))
  - 2) Once every 2 years, if the percent leaking connectors was less than 0.5 percent during the last required monitoring period. An owner or operator may comply with this paragraph by monitoring at least 40 percent of the connectors in the first year and the remainder of the connectors in the second year. The percent leaking connectors will be calculated for the total of all monitoring performed during the 2-year period. (40 CFR 63.174(b)(3)(ii) as referenced by 40 CFR 63.502(a))
  - 3) If the owner or operator of a process unit in a biennial leak detection and repair program calculates less than 0.5 percent leaking connectors from the 2-year monitoring period, the owner or operator may monitor the connectors one time every 4 years. An owner or operator may comply with the requirements of this paragraph by monitoring at least 20 percent of the connectors each year until all connectors have been monitored within 4 years. (40 CFR 63.174(b)(3)(iii) as referenced by 40 CFR 63.502(a))
  - 4) If a process unit complying with the requirements of paragraph (b) of 40 CFR 63.174 using a 4-year monitoring interval program has greater than or equal to 0.5 percent but less than 1 percent leaking connectors, the owner or operator shall increase the monitoring frequency to one time every 2 years. An owner or operator may comply with the requirements of this paragraph by monitoring at least 40 percent of the connectors in the first year and the remainder of the connectors in the second year. The owner or operator may again elect to use the provisions of Additional Condition 2.b.vi.3) when the percent leaking connectors decreases to less than 0.5 percent. (40 CFR 63.174(b)(3)(iv) as referenced by 40 CFR 63.502(a))
  - 5) If a process unit complying with requirements of paragraph (b)(3)(iii) of this section using a 4-year monitoring interval program has 1 percent or greater leaking connectors, the owner or operator shall increase the monitoring frequency to one time per year. The owner or operator may again elect to use the provisions of Additional Condition 2.b.vi.3) when the percent leaking connectors decreases to less than 0.5 percent. (40 CFR 63.174(b)(3)(v) as referenced by 40 CFR 63.502(a))

- 6) The owner or operator may choose not to monitor connectors that have been opened or otherwise had the seal broken. In this case, the owner or operator may not count nonrepairable connectors for the purpose of calculation of the percent leaking connectors in organic hazardous air pollutant service when using the equation specified in 40 CFR 63.174(i)(2) for the second and subsequent monitoring periods. If the owner or operator selects this option, the owner or operator shall calculate the percent leaking connectors for the second and subsequent monitoring periods by setting the nonrepairable component CAN in the equation in 40 CFR 63.174(i)(2) to zero for all monitoring periods. In the alternative, the owner or operator may choose to monitor each connector that has been opened or has otherwise had the seal broken for leaks when it is reconnected or within the first three months after being returned to organic hazardous air pollutant service. If, under this alternative, the monitoring detects a leak, it shall be repaired according to the provisions of 40 CFR 63.174(d), unless it is determined to be nonrepairable, in which case it shall be counted as a nonrepairable connector for the purpose of calculating the percent leaking connectors using the equation in 40 CFR 63.174(i)(2) for the second and all subsequent monitoring periods. The owner or operator may switch between the two alternatives set forth in this Additional Condition at the end of the current monitoring period, provided that the switch is reported in the next Periodic Report for Equipment Leaks as required by 40 CFR 63.182(d) as referenced by 40 CFR 63.506(e)(6), and begin the new alternative in annual monitoring. The initial monitoring in the new alternative shall be completed no later than 12 months after reporting the switch. (40 CFR 63.174(c)(1)(i) through (iii), as referenced by 40 CFR 63.502(a)) (See Comment 4)
- 7) When a leaking connector is detected, the owner or operator shall repair the leak as soon as practicable, but no later than 15 calendar days after the leak is detected, except as provided in 40 CFR 63.174(g) and in 40 CFR 63.171. A first attempt at repair shall be made no later than 5 calendar days after the leak is detected. (40 CFR 63.174(d) as referenced by 40 CFR 63.502(a))
- 8) Any connector that is designated as an unsafe-to-monitor connector, as described in 40 CFR 63.181(b)(7)(i), is exempt from the connector monitoring requirements of 40 CFR 63.174(a) and Additional Conditions 2.b.vi.1) through 5), if the owner or operator determines that the connector is unsafe to monitor because personnel would be exposed to an immediate danger as a result of complying with 40 CFR 63.174(a) through (e), and Additional Condition 2.b.vi. and its subparagraphs, and the owner or operator has a written plan that requires monitoring of the connector as frequently as practicable during safe to monitor periods, but not more frequently than the periodic monitoring schedule that would otherwise be applicable. (40 CFR 63.174(f), (f)(1) and (f)(2), as referenced by 40 CFR 63.502(a))

- 9) Any connector that is designated as an unsafe-to-repair connector, as described in 40 CFR 63.181(b)(7)(iii), is exempt from the requirements of 40 CFR 63.174(a), (d) and (e) if the owner or operator determines that repair personnel would be exposed to an immediate danger as a consequence of complying with 40 CFR 63.174(d) and Additional Condition 2.b.vi.7), and the connector will be repaired before the end of the next scheduled process unit shutdown. (40 CFR 63.174(g), (g)(1) and (g)(2), as referenced by 40 CFR 63.502(a))
  - 10) Any connector that is inaccessible or is ceramic or ceramic-lined (for example, porcelain, glass, or glass-lined), is exempt from the monitoring requirements of 40 CFR 63.174(a) and (c) and from the recordkeeping and reporting requirements of 40 CFR 63.181 and 63.182. An inaccessible connector is one that is buried; insulated in a manner that prevents access to the connector by a monitor probe; obstructed by equipment or piping that prevents access to the connector by a monitor probe; unable to be reached from a wheeled scissor-lift or hydraulic-type scaffold which would allow access to connectors up to 7.6 meters (25 feet) above the ground; unable to be reached without elevating the monitoring personnel more than 2 meters above a permanent support surface or requiring the erection of scaffolding; or unable to be accessed at any time in a safe manner to perform monitoring. Unsafe access includes, but is not limited to, the use of a wheeled scissor-lift on unstable or uneven terrain, the use of a motorized man-lift basket in areas where an ignition potential exists, or access would require near proximity to hazards such as electrical lines, or would risk damage to equipment. If any inaccessible or ceramic or ceramic-lined connector is observed by visual, audible, olfactory, or other means to be leaking, the leak shall be repaired as soon as practicable, but no later than 15 calendar days after the leak is detected, except as provided in 40 CFR 63.171 and 40 CFR 63.174(g) and Additional Condition 2.b.vi.9). (40 CFR 63.174(h) as referenced by 40 CFR 63.502(a))
- vii. For pressure relief devices in light liquid or heavy liquid service, and instrumentation systems shall be monitored within 5 calendar days by the method specified in 40 CFR 63.180(b) if evidence of a potential leak to the atmosphere is found by visual, audible, olfactory, or any other detection method. If such a potential leak is repaired as required in 40 CFR 63.169(c) and (d), it is not necessary to monitor the system for leaks by the method specified in 40 CFR 63.180(b) of this subpart. (40 CFR 63.169(a) as referenced by 40 CFR 63.502(a))
- 1) When a leak is detected, it shall be repaired as soon as practicable, but not later than 15 calendar days after it is detected, except as provided in 40 CFR 63.171 of this subpart. (40 CFR 63.169(c)(1) as referenced by 40 CFR 63.502(a))

- 2) The first attempt at repair shall be made no later than 5 calendar days after each leak is detected. (40 CFR 63.169(c)(2) as referenced by 40 CFR 63.502(a))
- 3) For equipment identified in 40 CFR 63.169(a) that is not monitored by the method specified in 40 CFR 63.180(b), repaired shall mean that the visual, audible, olfactory, or other indications of a leak to the atmosphere have been eliminated; that no bubbles are observed at potential leak sites during a leak check using soap solution; or that the system will hold a test pressure. (40 CFR 63.169(c)(3) as referenced by 40 CFR 63.502(a))

### 3. **Record Keeping** (40 CFR 63 Subpart U)

#### a. **HAP (Non-LDAR)**

- i. For Group 2 storage vessels (101A, 101B, 101C, 103A, 103B, 103C, 103D, 103E, 103F, 103G), the owner or operator shall keep readily accessible records showing the dimensions of the storage vessel and an analysis showing the capacity of the storage vessel. This record shall be kept as long as the storage vessel retains Group 2 status and is in operation. (40 CFR 63.484(a))
- ii. For Group 2 storage vessels (101A, 101B, 101C, 103A, 103B, 103C, 103D, 103E, 103F, 103G), the owner or operator shall monthly calculate and record the calendar monthly average temperature for each storage vessel from either the daily average temperatures or the actual monitored temperature values.
- iii. For Group 2 continuous front-end process vents (102E and 102F), the owner or operator shall monthly calculate and record the daily average product-side exit temperature from the final product condensers. If all measurements of the product-side exit temperatures are less than or equal to the maximum level set forth in Additional Condition 1.a.iv., the owner or operator may record that all values were below the maximum level and in compliance for that operating day instead of calculating and recording a daily average temperature.
- iv. For Group 2 continuous front end process vent (102G), the owner or operator shall monthly calculate the daily average absolute pressure for the heels case from the monitored absolute pressure values. If all measurements of the absolute pressure are greater than or equal to the minimum level set forth in Additional Condition 1.a.v., the owner or operator may record that all values were above the minimum level and in compliance for that operating day instead of calculating and recording a daily average absolute pressure
- v. For Group 2 batch front end process vents (204A through 204J), the owner or operator shall keep records of the following: (40 CFR 63.487(h))
  - 1) An identification of each unique product that has emissions from one or more batch emission episodes venting from the batch front-end

process vent, along with an identification of the single highest-HAP recipe for each product and the mass of HAP fed to the reactor for that recipe. (40 CFR 63.491(a)(1))

- 2) A description of, and an emission estimate for, each batch emission episode, and the total emissions associated with one batch cycle, if the group determination is based on the single highest-HAP recipe (considering all products produced or processed in the batch unit operation), records shall include the emission estimates for the single highest-HAP recipe. The sole elastomer product of the plant is Neoprene.(40 CFR 63.491(a)(2)(ii))
- 3) For each Group 2 batch front-end process vent that is exempt from the batch mass input limitation provisions because it meets the criteria of 40 CFR 63.487(h), the records specified in paragraphs (a)(9)(i) and (ii) of 40 CFR 63.491 shall be maintained. (40 CFR 63.491(a)(9))
  - a) Documentation of the maximum design capacity of the EPPU; and (40 CFR 63.491(a)(9)(i))
  - b) The mass of HAP or material that can be charged annually to the batch unit operation at the maximum design capacity. (40 CFR 63.491(a)(9)(ii))
- vi. For the Group 2 process wastewater originating from emission points (102E, 102F, 103E, 103B, 103J, 103K, C104, 105A7, 105G5, 105G6, 200E1, 200E2, 207A3, 207A6, 207A9, 207A12, 207A15, 207B1, 207B2, 301K1 through 301K7, AND 405A), the owner or operator shall keep in a readily accessible location the records specified in Additional Conditions 3.a.vi.1) through 4). (40 CFR 63.147(b)(8) as referenced by 40 CFR 63.501(a))
  - 1) Process unit identification and description of the process unit. (40 CFR 63.147(b)(8)(i) as referenced by 40 CFR 63.501(a))
  - 2) Stream identification code. (40 CFR 63.147(b)(8)(ii) as referenced by 40 CFR 63.501(a))
  - 3) For existing sources, concentration of table 9 compound(s) in parts per million, by weight. For new sources, concentration of table 8 and/or table 9 compound(s) in parts per million, by weight. Include documentation of the methodology used to determine concentration. (40 CFR 63.147(b)(8)(iii) as referenced by 40 CFR 63.501(a))
  - 4) Flow rate in liter per minute. (40 CFR 63.147(b)(8)(iv) as referenced by 40 CFR 63.501(a)) (See Comment 3)
- vii. For maintenance wastewaters, (40 CFR 63.105(a) as referenced by 40 CFR 63.501(b))

- 1) The owner or operator shall prepare a description of maintenance procedures for management of wastewaters generated from the emptying and purging of equipment in the process during temporary shutdowns for inspections, maintenance, and repair (i.e., a maintenance-turnaround) and during periods which are not shutdowns (i.e., routine maintenance). The descriptions shall:
  - a) Specify the process equipment or maintenance tasks that are anticipated to create wastewater during maintenance activities. (40 CFR 63.105(b)(1) as referenced by 40 CFR 63.501(b))
  - b) Specify the procedures that will be followed to properly manage the wastewater and control organic HAP emissions to the atmosphere; and (40 CFR 63.105(b)(2) as referenced by 40 CFR 63.501(b))
  - c) Specify the procedures to be followed when clearing materials from process equipment. (40 CFR 63.105(b)(3) as referenced by 40 CFR 63.501(b))
- 2) The owner or operator shall modify and update the information required by paragraph (b) of 40 CFR 63.105 as needed following each maintenance procedure based on the actions taken and the wastewaters generated in the preceding maintenance procedure. (40 CFR 63.105(c) as referenced by 40 CFR 63.501(b))

**b. HAP (LDAR)**

- i. A list of identification numbers for equipment (except connectors exempt from monitoring and recordkeeping identified in 40 CFR 63.174 and instrumentation systems) subject to the requirements of 40 CFR 63 Subpart H. Connectors need not be individually identified if all connectors in a designated area or length of pipe subject to the provisions of this subpart are identified as a group, and the number of connectors subject is indicated. With respect to connectors, the list shall be complete no later than the completion of the initial survey required by §63.174(b)(1) or (b)(2) of 40 CFR 63 Subpart H. (40 CFR 63.181(b)(1)(i) as referenced by 40 CFR 63.502(a))
- ii. A schedule by process unit for monitoring connectors subject to the provisions of §63.174(a) of 40 CFR 63 Subpart H and valves subject to the provisions of §63.168(d) of 40 CFR 63 Subpart H. (40 CFR 63.181(b)(1)(ii) as referenced by 40 CFR 63.502(a))
- iii. Equipment subject to the provisions of 40 CFR 63 Subpart H may be identified on a plant site plan, in log entries, or by other appropriate methods. (40 CFR 63.181(b)(1)(iii) as referenced by 40 CFR 63.502(a))

- iv. Identification of screwed connectors subject to the requirements of §63.174(c)(2) of 40 CFR 63 Subpart H. Identification can be by area or grouping as long as the total number within each group or area is recorded. (40 CFR 63.181(b)(5) as referenced by 40 CFR 63.502(a))
- v. The following information pertaining to all pumps subject to the provisions of §63.163(j) and valves subject to the provisions of §63.168(h) and (i) of 40 CFR 63 Subpart H shall be recorded: (40 CFR 63.181(b)(7) as referenced by 40 CFR 63.502(a))
  - 1) Identification of equipment designated as unsafe to monitor, difficult to monitor, or unsafe to inspect and the plan for monitoring or inspecting this equipment. (40 CFR 63.181(b)(7)(i) as referenced by 40 CFR 63.502(a))
  - 2) A list of identification numbers for the equipment that is designated as difficult to monitor, an explanation of why the equipment is difficult to monitor, and the planned schedule for monitoring this equipment. (40 CFR 63.181(b)(7)(ii) as referenced by 40 CFR 63.502(a))
- vi. For visual inspections of equipment subject to the provisions of 40 CFR 63 Subpart H [e.g., §63.163(b)(3), §63.163(e)(4)(i)], the owner or operator shall document that the inspection was conducted and the date of the inspection. The owner or operator shall maintain records as specified in paragraph (d) of 40 CFR 63.181 for leaking equipment identified in this inspection, except as provided in paragraph (e) of 40 CFR 63.181. These records shall be retained for 5 years. (40 CFR 63.181(c) as referenced by 40 CFR 63.502(a))
- vii. When each leak is detected as specified in §§63.163 and 63.164; §§63.168 and 63.169; and §§63.172 through 63.174 of 40 CFR 63 Subpart H, the following information shall be recorded and kept for 5 years: (40 CFR 63.181(d) as referenced by 40 CFR 63.502(a))
  - 1) The instrument and the equipment identification number and the operator name, initials, or identification number. (40 CFR 63.181(d)(1) as referenced by 40 CFR 63.502(a))
  - 2) The date the leak was detected and the date of first attempt to repair the leak. (40 CFR 63.181(d)(2) as referenced by 40 CFR 63.502(a))
  - 3) The date of successful repair of the leak. (40 CFR 63.181(d)(3) as referenced by 40 CFR 63.502(a))
  - 4) Maximum instrument reading measured by Method 21 of 40 CFR part 60, Appendix A after it is successfully repaired or determined to be nonrepairable. (40 CFR 63.181(d)(4) as referenced by 40 CFR 63.502(a))

- 5) "Repair delayed" and the reason for the delay if a leak is not repaired within 15 calendar days after discovery of the leak. (40 CFR 63.181(d)(5) as referenced by 40 CFR 63.502(a))
    - a) The owner or operator may develop a written procedure that identifies the conditions that justify a delay of repair. In such cases, reasons for delay of repair may be documented by citing the relevant sections of the written procedure. (40 CFR 63.181(d)(5)(i) as referenced by 40 CFR 63.502(a))
    - b) If delay of repair was caused by depletion of stocked parts, there must be documentation that the spare parts were sufficiently stocked on-site before depletion and the reason for depletion. (40 CFR 63.181(d)(5)(ii) as referenced by 40 CFR 63.502(a))
  - 6) Dates of process unit shutdowns that occur while the equipment is unrepaired. (40 CFR 63.181(d)(6) as referenced by 40 CFR 63.502(a))
  - 7) Copies of the periodic reports as specified in §63.182(d) of 40 CFR 63 Subpart H, if records are not maintained on a computerized database capable of generating summary reports from the records. (40 CFR 63.181(d)(9) as referenced by 40 CFR 63.502(a))
- viii. Each owner or operator of a process unit subject to the requirements of §§63.175 and 63.176 of 40 CFR 63 Subpart H shall maintain the records specified in paragraphs (h)(1) through (h)(9) of this section for the period of the quality improvement program for the process unit. (40 CFR 63.181(h) as referenced by 40 CFR 63.502(a)) (See Comment 5)
- 1) For owners or operators who elect to use a reasonable further progress quality improvement program, as specified in §63.175(d) of 40 CFR 63 Subpart H: (40 CFR 63.181(h)(1) as referenced by 40 CFR 63.502(a))
    - a) All data required in §63.175(d)(2) of 40 CFR 63 Subpart H. (40 CFR 63.181(h)(1)(i) as referenced by 40 CFR 63.502(a))
    - b) The percent leaking valves observed each quarter and the rolling average percent reduction observed in each quarter. (40 CFR 63.181(h)(1)(ii) as referenced by 40 CFR 63.502(a))
    - c) The beginning and ending dates while meeting the requirements of §63.175(d) of 40 CFR 63 Subpart H. (40 CFR 63.181(h)(1)(iii) as referenced by 40 CFR 63.502(a))

- 2) For owners or operators who elect to use a quality improvement program of technology review and improvement, as specified in §63.175(e) of 40 CFR 63 Subpart H: (40 CFR 63.181(h)(2) as referenced by 40 CFR 63.502(a))
  - a) All data required in §63.175(e)(2) of 40 CFR 63 Subpart H. (40 CFR 63.181(h)(2)(i) as referenced by 40 CFR 63.502(a))
  - b) The percent leaking valves observed each quarter. (40 CFR 63.181(h)(2)(ii) as referenced by 40 CFR 63.502(a))
  - c) Documentation of all inspections conducted under the requirements of §63.175(e)(4) of 40 CFR 63 Subpart H, and any recommendations for design or specification changes to reduce leak frequency. (40 CFR 63.181(h)(2)(iii) as referenced by 40 CFR 63.502(a))
  - d) The beginning and ending dates while meeting the requirements of §63.175(e) of 40 CFR 63 Subpart H. (40 CFR 63.181(h)(2)(iv) as referenced by 40 CFR 63.502(a))
- 3) For owners or operators subject to the requirements of the pump quality improvement program as specified in §63.176 of 40 CFR 63 Subpart H: (40 CFR 63.181(h)(3) as referenced by 40 CFR 63.502(a))
  - a) All data required in §63.176(d)(2) of 40 CFR 63 Subpart H. (40 CFR 63.181(h)(3)(i) as referenced by 40 CFR 63.502(a))
  - b) The rolling average percent leaking pumps. (40 CFR 63.181(h)(3)(ii) as referenced by 40 CFR 63.502(a))
  - c) Documentation of all inspections conducted under the requirements of §63.176(d)(4) of 40 CFR 63 Subpart H, and any recommendations for design or specification changes to reduce leak frequency. (40 CFR 63.181(h)(3)(iii) as referenced by 40 CFR 63.502(a))
  - d) The beginning and ending dates while meeting the requirements of §63.176(d) of 40 CFR 63 Subpart H. (40 CFR 63.181(h)(3)(iv) as referenced by 40 CFR 63.502(a))
- 4) If a leak is not repaired within 15 calendar days after discovery of the leak, the reason for the delay and the expected date of successful repair. (40 CFR 63.181(h)(4) as referenced by 40 CFR 63.502(a))
- 5) Records of all analyses required in §§63.175(e) and 63.176(d) of 40 CFR 63 Subpart H. The records will include the following: (40 CFR 63.181(h)(5) as referenced by 40 CFR 63.502(a))

- a) A list identifying areas associated with poorer than average performance and the associated service characteristics of the stream, the operating conditions and maintenance practices. (40 CFR 63.181(h)(5)(i) as referenced by 40 CFR 63.502(a))
  - b) The reasons for rejecting specific candidate superior emission performing valve or pump technology from performance trials. (40 CFR 63.181(h)(5)(ii) as referenced by 40 CFR 63.502(a))
  - c) The list of candidate superior emission performing valve or pump technologies, and documentation of the performance trial program items required under §§63.175(e)(6)(iii) and 63.176(d)(6)(iii) of 40 CFR 63 Subpart H. (40 CFR 63.181(h)(5)(iii) as referenced by 40 CFR 63.502(a))
  - d) The beginning date and duration of performance trials of each candidate superior emission performing technology. (40 CFR 63.181(h)(5)(iv) as referenced by 40 CFR 63.502(a))
- 6) All records documenting the quality assurance program for valves or pumps as specified in §§63.175(e)(7) and 63.176(d)(7) of 40 CFR 63 Subpart H. (40 CFR 63.181(h)(6) as referenced by 40 CFR 63.502(a))
  - 7) Records indicating that all valves or pumps replaced or modified during the period of the quality improvement program are in compliance with the quality assurance requirements in §63.175(e)(7) and §63.176(d)(7) of 40 CFR 63 Subpart H. (40 CFR 63.181(h)(7) as referenced by 40 CFR 63.502(a))
  - 8) Records documenting compliance with the 20 percent or greater annual replacement rate for pumps as specified in §63.176(d)(8) of 40 CFR 63 Subpart H. (40 CFR 63.181(h)(8) as referenced by 40 CFR 63.502(a))
  - 9) Information and data to show the corporation has fewer than 100 employees, including employees providing professional and technical contracted services. (40 CFR 63.181(h)(9) as referenced by 40 CFR 63.502(a))
- ix. Identification, either by list, location (area or group) of equipment in organic HAP service less than 300 hours per year within a process unit subject to the provisions of 40 CFR 63 Subpart H under §63.160 of 40 CFR 63 Subpart H. (40 CFR 63.181(j) as referenced by 40 CFR 63.502(a))

4. **Reporting** (40 CFR 63 Subpart U)

The owner or operator shall clearly identify all deviations from permit requirements in the semi-annual reports. If no deviations occur in that reporting period then the owner or operator shall report a negative declaration for the following category:

a. **HAP (Non-LDAR)**

- i. For Group 2 storage vessels (101A, 101B, 101C, 103A, 103B, 103C, 103D, 103E, 103F, 103G), the owner or operator shall report any calendar monthly average temperature that exceeded the applicable temperature limitation. (40 CFR 63.506(e)(6))
- ii. For Group 2 continuous front-end process vents (102E, 102F, 207A3, 207A6, 207A9, 207A12, and 207A15), the owner or operator shall report any daily average temperature that exceeded the applicable temperature limitation. (40 CFR 63.506(e)(6))
- iii. For Group 2 continuous front end process vent (102G), the owner or operator shall report any daily average absolute pressure that exceeded the applicable absolute pressure limitation. (40 CFR 63.506(e)(6))
- iv. Whenever a process change, as defined in 40 CFR 63.488(i)(1), is made that causes a Group 2 batch front-end process vent to become a Group 1 batch front-end process vent, the owner or operator shall notify the District and submit a description of the process change within 180 days after the process change is made or with the next Periodic Report, whichever is later. The owner or operator of an affected source shall comply with the Group 1 batch front-end process vent provisions in §§63.486 through 63.492 in accordance with §63.480(i)(2)(ii). (40 CFR 63.492(b) as referenced by 40 CFR 63.487(h))
- v. The owner or operator shall submit a periodic report semiannually no later than 60 days after the end of each 6-month period. The first report shall be submitted no later than 240 days after the date the Notification of Compliance Status is due and shall cover the 6-month period beginning on the date the Notification of Compliance Status is due. The periodic report shall contain the following information: (40 CFR 63.506(e)(6)(i))
  - 1) All information specified in §63.492 for batch front-end process vents. (40 CFR 63.506(e)(6)(iii)(A))
  - 2) Notification if a process change is made such that the group status of any emission point changes from Group 2 to Group 1. The owner or operator is not required to submit a notification of a process change if that process change caused the group status of an emission point to change from Group 1 to Group 2. However, until the owner or operator notifies the District that the group status of an emission point has changed from Group 1 to Group 2, the owner or operator is required to continue to comply with the Group 1 requirements for that

emission point. This notification may be submitted at any time. (40 CFR 63.506(e)(6)(iii)(D)(2))

- 3) Notification if one or more emission points (other than equipment leaks) or one or more EPPU is added to an affected source. The owner or operator shall submit the information contained in Additional Conditions 4.a.ii.3)(a) and (b). (40 CFR 63.506(e)(6)(iii)(D)(3))
  - a) A description of the addition to the affected source; and (40 CFR 63.506(e)(6)(iii)(D)(3)(i))
  - b) Notification of the group status of the additional emission point or all emission points in the EPPU. (40 CFR 63.506(e)(6)(iii)(D)(3)(ii))
- 4) Notification of a change in the primary product of an EPPU, in accordance with the provisions in §63.480(f). This includes a change in primary product from one elastomer product to either another elastomer product or to a non-elastomer product. (40 CFR 63.506(e)(6)(vi)) (See Comment 6)

**b. HAP (LDAR)**

The owner or operator shall report the information listed in Additional Conditions 4.b.(i. through xi.) in semi-annual Periodic Reports submitted under the conditions specified in 40 CFR 63.182(d), as directed by 40 CFR 63.506(e)(6), to the Air Pollution Control District and U.S. EPA Region 4.

- i. The number of valves for which leaks were detected as described in 40 CFR 63.168(b) of this subpart, the percent leakers, and the total number of valves monitored; (40 CFR 63.182(d)(2)(i) as referenced by 40 CFR 63.502(a))
- ii. The number of valves for which leaks were not repaired as required in 40 CFR 63.168(f) of this subpart, identifying the number of those that are determined nonreparable; (40 CFR 63.182(d)(2)(ii) as referenced by 40 CFR 63.502(a))
- iii. The number of pumps for which leaks were detected as described in 40 CFR 63.163(b) of this subpart, the percent leakers, and the total number of pumps monitored; (40 CFR 63.182(d)(2)(iii) as referenced by 40 CFR 63.502(a))
- iv. The number of pumps for which leaks were not repaired as required in 40 CFR 3.163(c) of this subpart; (40 CFR 63.182(d)(2)(iv) as referenced by 40 CFR 63.502(a))
- v. The number of connectors for which leaks were detected as described in 40 CFR 63.174(a) of this subpart, the percent of connectors leaking, and the total

number of connectors monitored; (40 CFR 63.182(d)(2)(ix) as referenced by 40 CFR 63.502(a))

- vi. The number of connectors for which leaks were not repaired as required in 40 CFR 63.174(d) of this subpart, identifying the number of those that are determined nonrepairable; (40 CFR 63.182(d)(2)(xi) as referenced by 40 CFR 63.502(a))
- vii. The facts that explain any delay of repairs and, where appropriate, why a process unit shutdown was technically infeasible. (40 CFR 63.182(d)(2)(xiii) as referenced by 40 CFR 63.502(a))
- viii. The results of all monitoring to show compliance with 40 CFR 63.164(i), 63.165(a), and 63.172(f) conducted within the semiannual reporting period. (40 CFR 63.182(d)(2)(xiv) as referenced by 40 CFR 63.502(a))
- ix. If applicable, the initiation of a monthly monitoring program under 40 CFR 63.168(d)(1)(i) of this subpart, or a quality improvement program under either 40 CFR 63.175 or 63.176. (40 CFR 63.182(d)(2)(xv) as referenced by 40 CFR 63.502(a))
- x. If applicable, notification of a change in connector monitoring alternatives as described in 40 CFR 63.174(c)(1). (40 CFR 63.182(d)(2)(xvi) as referenced by 40 CFR 63.502(a))
- xi. If applicable, the compliance option that has been selected under 40 CFR 63.172(n). (40 CFR 63.182(d)(2)(xvii) as referenced by 40 CFR 63.502(a))

### Comments

1. For the storage vessels, continuous front end process vents, batch front end process vents, and the wastewater discharge group status, the Notification of Compliance Status report was submitted on November 16, 2001 and contained the information required by 40 CFR 63.506(e)(5).
2. Storage vessels (208A through 208W) are exempt from the requirements of 40 CFR 63.484 per 40 CFR 63.484(b)(2) and (3). 40 CFR 63 Subpart U exempts storage vessels containing high-conversion latex products and latex products other than styrene-butadiene latex located downstream of the stripping operations.
3. The Notification of Compliance Status report submitted on November 16, 2001 demonstrated that the concentration for the wastewater stream to be considered Group I could not be exceeded at any flow rate, so therefore the owner or operator shall not be required to monitor the flow rate.
4. DuPont Dow routinely includes in its Periodic Reports for Equipment Leaks a statement that it has selected the option set forth at 40 CFR 63.174(c)(1)(ii) and has not elected to change its selected option. Accordingly, DuPont Dow is exempt from the requirement to track

connectors that have been opened or otherwise had the seal broken and to re-monitor them when reconnected or within three months of being returned to organic HAP service. DuPont Dow is in compliance with the consequence of its selected option, which bars the company from taking credit for nonrepairable connectors when calculating the percentage of leaking connectors subject to the equipment leaks standard. Additionally, DuPont Dow is exempt from the recordkeeping requirements set forth in Additional Conditions 3.b.ix.7) and 8) and 40 CFR 63.181(d)(7)(i) and (ii) for those connectors.

5. Beginning on or before the compliance date of July 31, 1997, for elastomer product process units subject to 40 CFR Part 63, Subpart U, DuPont Dow Elastomers L.L.C. - Louisville Plant has routinely demonstrated compliance with the provisions of the Equipment Leak standard codified at 40 CFR Part 63, Subpart H. The facility has established a historical record through its Periodic Reports, as required by 40 CFR 63.182, 63.502(a) and 63.506(e)(6). These reports demonstrate that the valves and pumps in organic HAP service at this facility are maintained in excellent condition, resulting in very low percentages of leaking valves and pumps. As long as the facility maintains its percent leaking valves at a level less than 2% as a rolling average over the two most recent monitoring periods, and its percent leaking pumps at a level less than 10% as a six-month rolling average, the facility is not required to implement a Quality Improvement Program for valves or pumps as codified at 40 CFR 63.175 and 63.176, respectively.
6. The elastomer process product unit at the DuPont Dow Elastomers L.L.C. - Louisville Plant is designed and operated solely to produce products meeting the definition of Neoprene synthetic rubber in 40 CFR 63.482. Accordingly, the facility has identified its primary elastomer product as Neoprene in its Notification of Compliance Status submittal dated November 16, 2001. Should the facility change its primary elastomer product to either another elastomer product or to a non-elastomer product, the facility will be required to provide notification of this change to the Air Pollution Control District and the U.S. EPA.

### Permit Shield

The owner or operator is hereby granted a permit shield that shall apply as long as the owner or operator demonstrates ongoing compliance with all conditions of this permit. Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements of the regulations cited in this permit as of the date of issuance, pursuant to Regulation 2.16, section 4.6.1.

### Off-Permit Documents

<u>Document</u>	<u>Date</u>
Risk Management Plan	June 15, 1999
1.18 Rule Effectiveness Plan	September 20, 1994
1.05 VOC Compliance Plan	March 22, 1993
TAP (toluene) Plant wide Modeling	October 1987
TAP (hydrochloric acid) Plant wide Modeling	April 1993
TAP (chloroprene) Emission Unit P-3 Modeling	October 1997
VOC Compliance Demonstrations for Regulations 6.22 and 6.24	November 27, 2000
PM One-Time Compliance Demonstrations	November 27, 2000
VOC Compliance Demonstrations for Regulation 6.43 and 7.25	December 18, 2000
VOC Compliance Demonstrations for Regulation 7.25	February 15, 2002
VOC Compliance Demonstrations for Regulation 6.24	February 15, 2002
Notification of Compliance Status for non-equipment leaks	November 16, 2001
Precompliance report for non-equipment leaks	December 19, 2000
Notification of Compliance Status Addendum, Heat Exchange Systems	July 8, 2002
Notification of Compliance Status (LDAR)	December 29, 1997
Notification of Compliance Status (LDAR) Corrections	February 24, 1998

### Alternative Operating Scenarios

The owner or operator did not request to operate under any alternative operating scenario in its Title V application.

<b>Source-Wide HAP Speciation</b>			
<b>HAP</b>	<b>CAS No.</b>	<b>HAP</b>	<b>CAS No.</b>
Chloroprene	126-99-8	Methylene Chloride	75-09-2
Toluene	108-88-3	Chlorine	7782-50-5
Hydrochloric Acid	7647-01-0	Tetrachloroethylene (Perchloroethylene)	127-18-4

<b>Insignificant Activities</b>		
<b>Description</b>	<b>Quantity</b>	<b>Basis</b>
Research and Development activities	various	Regulation 2.02, section 2.3.27
Internal combustion engines	various	Regulation 2.02, section 2.2
Brazing, soldering, or welding equipment	various	Regulation 2.02, section 2.3.4
Woodworking, not including hogging or burning	various	Regulation 2.02, section 2.3.5
Emergency relief vents and ventilating systems (not otherwise regulated)	various	Regulation 2.02, section 2.3.10
Lab ventilating and exhausting systems for nonradioactive materials	various	Regulation 2.02, section 2.3.11
Portable diesel tanks or gasoline storage tanks of less than 250 gallons	various	Regulation 2.02, section 2.3.23
Welding ventilation system	various	Regulation 2.02, section 2.3.4
Chlorine tankcar unloading (< 1 lb/yr emissions by calculation)	various	No applicable regulation
Acetic acid tankcar unloading (cold weather warming operations)	various	No applicable regulation
Resin/Rosin unloading	various	No applicable regulation
Dust Collector for Wastewater filtration (vents inside building)	various	Regulation 2.02, section 2.3.21
Miscellaneous Totes and Drums (all emission units)	various	No applicable regulation
Label Operation	various	No applicable regulation
Coagulation Basin Operation	various	No known regulated emissions
Waste Polymer Handling	various	No applicable regulation
Maintenance Spray Painting (Pump Shop)	various	EPA White Papers

- A. Insignificant Activities are only those activities or processes falling into the general categories defined in Regulation 2.02, Section 2, and not associated with a specific operation or process for which there is a specific regulation. Equipment associated with a specific operation or process (Emission Unit) shall be listed with the specific process even though there may be no applicable requirements. Information contained in the permit and permit summary shall clearly indicate that those items identified with negligible emissions have no applicable requirements.
- B. Activities identified In Regulation 2.02, Section 2, may not require a permit and may be insignificant with regard to application disclosure requirements but may still have generally applicable requirements that continue to apply to the source and must be included in the Title V permit.
- i. No facility, having been designated as an insignificant activity, shall be exempt from any generally applicable requirements which shall include a 20% opacity limit for facilities not otherwise regulated.
  - ii. No periodic monitoring shall be required for facilities designated as insignificant activities.
- C. The Insignificant Activities table is correct as of the date of the permit was proposed for review by the USEPA, Region 4. The company shall submit an updated list of insignificant activities annually with the Title V compliance certification pursuant to District Regulation 2.16, section 4.3.5.3.6.